

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 0008

Permit Term: April 1, 1998 to March 31, 2003

Company Name / Address

Vintage Petroleum, Inc.
4200 One Williams Center
Tulsa, OK 74172

Mr. William Dozier
Vice President - Operations
918/592-0101

Facility Name / Address

Grubb/Rincon Field
3055 West Pacific Coast Highway
Ventura, CA 93001

Mr. Jim Miller
Title V Contact
918/561-5407 and 918/592-0101

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Karl E. Krause, Manager
Engineering Section

Richard H. Baldwin
Air Pollution Control Officer

M:TITLEV-PERMIT0008

VINTAGE PETROLEUM, INC. GRUBB/RINCON FIELD
PART 70 PERMIT NO. 0008
TABLE OF CONTENTS

1. Permit Cover Sheet
2. Permitted Equipment and Applicable Requirements Table
3. Permitted Throughput and Consumption Limit Table
4. Permitted Emissions Table
5. Oil Well List
6. Exempt Equipment List
7. Specific Applicable Requirements (Attachments)
 - a. Rule 71.1, Crude Oil Production and Separation (71.1N1, 71.1N3, 71.1N4, 71.1N6)
 - b. Rule 71.3, Transfer of Reactive Organic Liquids (71.3N1)
 - c. Rule 71.4, Petroleum Sumps, Pits, Ponds and Well Cellars (71.4N1, 71.4N2, 71.4N4-0008)
 - d. Rule 71.5, Glycol Dehydrators (71.5N1)
 - e. Rule 74.9, Stationary Internal Combustion Engines (74.9N3, 74.9N6)
 - f. Rule 74.15.1, Boilers, Steam Generators and Process Heaters (74.15.1N4)
 - g. Rule 74.23, Stationary Gas Turbines (74.23N2-8)
 - h. NSPS 40 CFR Part 60 Subpart GG, Stationary Gas Turbines (NSPS GG)
8. Permit Specific Conditions (Attachments)
 - a. General Recordkeeping Requirements (PO0008PC1)
 - b. Natural Gas Only Combustion Requirements (PO0008PC1)
 - c. Maximum Number of Oil Wells (PO0008PC1)
 - d. BACT Requirements for Oil Wells (PO0008PC1)
 - e. Solvent Wipe Cleaning Additional Requirements (PO0008PC1)
 - f. 3.3 MW Solar Centaur H Turbine (PO0008PC2)
 - g. Grubb Lease Compressor Plant Grid Power (PO0008PC3)
 - h. Oak Grove Lease Crude Oil Loading Facility (PO0008PC4)
 - i. Hobson C Lease Crude Oil Loading Facility (PO0008PC4)
 - j. Open Top Blowdown Tank Requirements (PO0008PC5)

- k. Portable 90 HP Waukesha Pump Engines (PO0008PC6)
- l. Portable Open Top Mixing Tanks (PO0008PC7)
- m. Grubb Lease C.E. Natco Heater Treater (PO0008PC8)
- n. Out of Service Turbine Requirements (PO0008PC9)

9. General Applicable Requirements (Attachments)

- a. Rule 50, Opacity (50)
- b. Rule 52, Particulate Matter - Concentration (52)
- c. Rule 54.B.1, Sulfur Compounds - SO_x at Point of Discharge (54.B.1)
- d. Rule 54.B.2, Sulfur Compounds - SO_x at or Beyond Property Line (54.B.2)
- e. Rule 57.B, Combustion Contaminants - Fuel Burning (57.B)
- f. Rule 64.B.1, Sulfur Content of Fuels - Gaseous Fuels (64.B.1)
- g. Rule 64.B.2, Sulfur Content of Fuels - Solid or Liquid Fuels (64.B.2)
- h. Rule 68, Carbon Monoxide (68)
- i. Rule 71.1.C, Crude Oil Production and Separation - Produced Gas (71.1.C)
- j. Rule 71.4.B.1, First Stage Sump Prohibition (71.4.B.1)
- k. Rule 71.4.B.3, Well Cellar Storage Prohibition (71.4.B.3)
- l. Rule 74.6, Surface Cleaning and Degreasing - Wipe Cleaning (74.6)
- m. Rule 74.10, Fugitive Emissions - Oilfields (74.10)
- n. Rule 74.22, Natural Gas-Fired, Fan-Type Central Furnaces (74.22)

10. General Requirements for Short-Term Activities (Attachments)

- a. Rule 74.1, Abrasive Blasting (74.1)
- b. Rule 74.2, Architectural Coatings (74.2)
- c. Rule 74.4.D, Cutback Asphalt - Road Oil (74.4.D)
- d. Rule 74.16, Oilfield Drilling Operations (74.16)
- e. Rule 74.26, Crude Oil Storage Tank Degassing Operations (74.26)
- f. Rule 74.29, Soil Decontamination Operations (74.29)

11. General Permit Conditions

- a. Part 70 Permit General Conditions
- b. Permit to Operate General Conditions

12. Miscellaneous Federal Program Conditions

- a. 40 CFR Part 68-Accidental Release Prevention and Risk Management Plans (40CFR68)
- b. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)

13. Part 70 Permit Application Package

Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

M:\TITLEV\PERMIT\PO0008\OUTLINE

2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

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VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 0008 Permitted Equipment and Applicable Requirements									
M:\TITLEV\LOTUS\AR_0008P	7	7	7	7	7	7	7	N	A
29-Apr-98	1	1	1	1	4	4	4	S	D
Equipment	P	D.
	1	3	4	5	9	1	2	S	R
						5	3		E
						.		G	Q.
						1		G	
FORMER PERMIT NO. 0008 GRUBB LEASE									
1 - 5 BBL Covered Drip Pit (Centaur Generator)			1						
1 - 5 BBL Covered Drip Pit (Amphitheater Waterflood)			1						
1 - 4686 BHP (3.3 MW) Solar Centaur H NG/FO Turbine Generator							2-8	X	PC1, PC2
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428688)									PC9
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428689)									PC9
Grubb Lease Compressor Plant									PC3
1 - Glycol Dehydrator System (2.2 MMSCFD/Triethylene Glycol) consisting of:									
1 - Glycol Dehydrator Vent VR				1					
1 - 0.497 MMBtu/Hr NG Glycol Reboiler									
1 - 100 BBL Drip Collection Tank VR	1								
1 - 5 BBL Covered Drip Pit			1						
Tank Battery No. 1									
1 - 5,000 BBL Wash Tank (T1) VR	1								
1 - 1,000 BBL PWT (T3) VR	1								
1 - 500 BBL PWT (T4) VR	1								
1 - 5,000 BBL LACT Tank (T2) VR	1								
1 - 288 Sqft Covered Sump (P4)			1						

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0008P	7	7	7	7	7	7	7	N	A
29-Apr-98	1	1	1	1	4	4	4	S	D
	P	D.
Equipment	1	3	4	5	9	1	2	S	R
						5	3		E
						.		G	Q.
						1		G	
1 - 4.5 MMBTU/Hr NG Natco Heater Treater UNC (SN 16388)						4			PC8
Tank Battery No. 2									
1 - 3,000 BBL Wash Tank (T9) VR	1								
1 - 5,000 BBL Wash Tank (T12) VR	1								
1 - 3,750 BBL PWT (T10) VR	1								
1 - 1,000 BBL PWT (T34) VR	1								
1 - 3,750 BBL LACT Tank (T11) VR	1								
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 7									
1 - 24 BBL Open Top Blowdown Tank (BD7)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 12									
1 - 24 BBL Open Top Blowdown Tank (BD12)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 20									
1 - 1,000 BBL LACT Tank (T14) VR	1								
1 - 1,000 BBL LACT Tank (T15) VR	1								
1 - 24 BBL Open Top Blowdown Tank (BD20)									PC5
1 - 5 BBL Covered Drip Pit			1						
1 - 5 BBL Covered Drip Pit			1						

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0008P	7	7	7	7	7	7	7	N	A
29-Apr-98	1	1	1	1	4	4	4	S	D
	P	D.
Equipment	1	3	4	5	9	1	2	S	R
						5	3	G	E
						1		G	Q.
Test Location No. 28									
1- 2,500 bbl Wash (T5) VR	1								
1 - 24 BBL Open Top Blowdown Tank (BD28)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 164									
1 - 24 BBL Open Top Blowdown Tank (BD164)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 275									
1 - 24 BBL Open Top Blowdown Tank (BD275)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 288									
1 - 24 BBL Open Top Blowdown Tank (BD288)									PC5
1 - 5 BBL Covered Drip Pit			1						
Test Location No. 403									
1- 1,000 BBL COST (T8) VR	1								
1- 1,000 BBL LACT Tank (T6) VR	1								
1- 1,000 BBL LACT Tank (T7) VR	1								
1 - 24 BBL Open Top Blowdown Tank (BD403)									PC5
1 - 5 BBL Covered Drip Pit (Test No. 403)			1						
1 - 5 BBL Covered Drip Pit (Pipeyard)			1						

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0008
Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0008P	7	7	7	7	7	7	7	N	A
29-Apr-98	1	1	1	1	4	4	4	S	D
	P	D.
Equipment	1	3	4	5	9	1	2	S	R
						5	3		E
						.		G	Q.
						1		G	
Test Location No. 408									
1 - 5 BBL Covered Drip Pit			1						
1 - 24 BBL Open Top Blowdown Tank (BD408)									PC5
Test Location No. 608									
1 - 24 BBL Open Top Blowdown Tank (BD608)									PC5
1 - 5 BBL Covered Drip Pit			1						
Produced Water Plant									
1- 5,000 BBL PWT (T16) VR	1								
1- 640 BBL PWT (T25) VR	1								
1- 640 BBL PWT (T26) VR	1								
1 - 300 BBL PWT (T32) VR	1								
1- 1,000 BBL PWT (Filtered) (T33) VR	1								
1- 500 BBL Superior Flotation Cell (T17) VR	1								
1- 500 BBL Superior Flotation Cell (T18) VR	1								
1- 150 BBL Wemco Flotation Cell (T19) VR	1								
1- 2,860 Sqft Flotation Cell Clarifier Sump (P19) Exempt BACT			4						
1- 2,860 Sqft Spent Acid Sump (P20) Exempt BACT			4						
1- 250 Sqft Filter Flush Pit (P21) Emergency Only			2						
1- 250 Sqft Covered Filter Flush Clear Water Sump (P23)			1						
1- 300 Sqft Cone Tower Sump (P24) Exempt BACT			4						
1 - 350 BBL Cone Tower with P-V Valve Exempt <5 mg/l	4								

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0008P	7	7	7	7	7	7	7	N	A
29-Apr-98	1	1	1	1	4	4	4	S	D
	P	D.
Equipment	1	3	4	5	9	1	2	S	R
						5	3		E
						.		G	Q.
						1		G	
1 - 1500 BBL Wash Tank VR	1								
1 - 3000 BBL COST (No. 20X1222) VR	1								PC1
1 - 2000 BBL COST (No. 20X445) VR (standby)	1								PC1
1 - 1500 BBL LACT Tank No. 6 VR	1								
1 - 1500 BBL LACT Tank No. 5 VR	1								
1 - 2000 BBL Slop Tank (No. 20X444) VR	1								PC1
1 - Crude Oil Loading Facility BL VR		1							PC1, PC4
Water Treatment Tank Battery Hobson C Lease									
1 - 2000 BBL PWT (Blend) VR	1								
1 - 1500 BBL PWT (Backwash) VR	1								
1 - 16,000 BBL PWT (Divert, TVP < 0.5 psia) UNC	3								
1 - 2000 BBL PWT (Filtered) VR	1								
1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l	4								
1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l	4								
Water Treatment Facility Hobson C Lease									
1 - 173 BBL WEMCO PWT (No. 76) VR	1								
1 - 120 BBL Slop Tank (No. 3) VR	1								PC1
1-181 BBL Open Top Flotation Cell (No. 1) Exempt < 5 mg/l	4								
1 - 120 BBL Open Top Flotation Cell (No. 2) Standby, Exempt < 5 mg/l	4								

Permitted Equipment and Applicable Requirements

Solvent Wipe Cleaning Operations

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude

oil from a storage tank or group of tanks to a delivery vessel.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

BHP The output of an internal combustion engine as measured in brake horsepower.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

Sump Device used for separation, generally in constant use.

Pit Device used to receive emergency or intermittent flows.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 72.23 compliance requirements.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 70, "Storage and Transfer of Gasoline"

(District: 5/13/97 SIP: 5/4/95)

1. Storage tank shall be equipped with a submerged fill pipe only, tank is exempt from Phase I and Phase II vapor recovery since gasoline throughput has not exceeded 6,000 gallons per year. (70.B.1 and 70.F.3) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
2. Storage tank shall be equipped with a submerged fill pipe and Phase I vapor recovery, tank is exempt from Phase II vapor recovery since gasoline throughput has not exceeded 24,000 gallons per year (70.B.1, 70.B.2, and 70.F.4) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
3. Storage tank shall be equipped with a submerged fill pipe, Phase I vapor recovery, and Phase II vapor recovery. (70.B.1, 70.B.2, and 70.B.9) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15) Operation and maintenance requirements for Phase II vapor recovery components. (70.E)

Rule 71.1, "Crude Oil Production and Separation"

(District: 6/6/92 SIP: 6/6/92)

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"

(District: 6/16/92 SIP: 6/16/92)

1. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery based on low throughput. (71.3.B.1) Requirement for leak-free equipment. (71.3.B.3)
2. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system with automatic primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
3. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system with automatic primary and secondary overfill protection. (71.3.B.2.a.2 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
4. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system and APCO-approved alternative primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
5. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system and APCO-approved alternative primary and secondary overfill protection (71.3.B.2.a.2 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
6. Exemption from Rule 71.3 because the crude oil has a modified Reid vapor pressure of less than 0.5 psia. (71.3.E.1)
7. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank exempt from the vapor recovery requirements of Rule 71.1. (71.3.B.1 and 71.3.E.2) Requirement for leak-free equipment. (71.3.B.3)
8. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank that is located more than 1200 feet from a loading facility constructed prior to July 1, 1990. (71.3.B.1 and 71.3.E.3) Requirement for leak-free equipment. (71.3.B.3)
9. Exemption from Rule 71.3 because the crude oil is being transferred into a vacuum truck, and not into a ROC liquid delivery vessel as defined in Rule 71.B.26. (71.B.26)

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"

(District: 6/8/93 SIP: 6/8/93)

1. Second and third stage sumps, pits, and ponds shall have an impermeable cover (71.4.B.2)
2. Exemption from cover requirement for emergency pits (71.4.C.1.b)
3. Exemption from cover requirement for sumps, pits, or pond if the ROC content of the liquid at the point of entry is less than 5 milligrams per liter (71.4.C.1.c)

4. Exemption from cover requirement for sumps, pits, or pond when a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.4.C.1.d)

Rule 71.5, "Glycol Dehydrators"

(District: 12/13/94 SIP: 12/13/94)

1. Requirement to have a condenser or separator system which directs vapors to a fuel gas or sales gas system. (71.5.B.1.a.1) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
2. Requirement to have a condenser or separator system which directs vapors to a flare, incinerator, thermal oxidizer or reboiler. (71.5.B.1.a.2) Operation requirements for flare or incinerator. (71.5.B.1.b) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
3. Requirement to have a condenser or separator system which directs vapors to another 95% control system. (71.5.B.1.a.3) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
4. Requirement to have any other control system with a 95% control efficiency or which meets an emission limit of 1.7 lb ROC per MMSCF of gas dehydrated. (71.5.B.1.c) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
5. Exemption from the control requirements of Rule 71.5 for unit that is operated less than 200 hours per year. (71.5.C)

Rule 74.9, "Stationary Internal Combustion Engines"

(District: 12/21/93 SIP: 12/21/93)

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)

7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

Rule 74.15, "Boilers, Steam Generators and Process Heaters"

(District: 11/8/94 SIP: 11/8/94)

1. NO_x and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

Rule 74.15.1, "Boilers, Steam Generators and Process Heaters"

(District: 6/13/95 SIP: 5/11/93)

1. NO_x and CO emission limits for units with an annual heat input greater than or equal to 1,800 MMBTU. (74.15.1.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of greater than or equal to 300 MMBTU and less than 1,800 MMBTU. (74.15.1.B.2 and 74.15.1.D.1)
3. Exemption from tuning requirements for units with an annual heat input rate less than 300 MMBTU and requirement for metering. (74.15.1.B.2 and 74.15.1.D.1)
4. Equipment is currently shut-down and not operating. Upon operation will install fuel meter (74.15.1.D.1). Based on annual heat input will perform tuning (74.15.1.B.2) or will comply with NO_x and CO emission limits (74.15.1.B.1).

Rule 74.23, "Stationary Gas Turbines"

(District: 10/10/95 SIP: 10/10/95)

1. NO_x and NH₃ emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
2. NO_x and NH₃ emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NO_x and NH₃ emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NO_x and NH₃ emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NO_x emission limit for turbines rated at 10.0 MW and higher, without SCR, and

- operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
 7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
 8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
 9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
 10. Pre-April 30, 2001 NOx emission limit and CEMS requirement and post-April 30, 2001 NOx emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, 74.23.B.5, and 74.23.I.3)

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's existing permit files for this stationary source.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year

Days/Yr: days per year

FO: fuel oil or diesel fuel

Gal/Yr: gallons per year

Hrs/Day: hours per day

Hrs/Yr: hours per year

Lbs ROC/Yr: pounds of reactive organic compounds per year

MBBL/Yr: thousands of barrels per year

MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year

MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas

TPY: tons per year

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0008P 29-Apr-98 Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
FORMER PERMIT NO. 0008 GRUBB LEASE				
1 - 5 BBL Covered Drip Pit (Centaur Generator)				
1 - 5 BBL Covered Drip Pit (AmphitheaterWaterflood)				
1 - 4686 BHP (3.3 MW) Solar Centaur H NG/FO Turbine Generator	387.8 MMCF/Yr NG & 25.0 Mgal/Yr FO	F	387.8 MMCF/Yr NG	
	& 443,678 MMBTU/Yr Total Fuel**	F	& 25.0 MGal/Yr FO	
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428688)	No Limit		200.6 MMCF/Yr	
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428689)	*		*	
Grubb Lease Compressor Plant				
1 - Glycol Dehydrator System (2.2 MMSCFDTriethylene Glycol) consisting of:				
1 - Glycol Dehydrator Vent VR	No Limit		8760 Hrs/Yr	
1 - 0.497 MMBtu/Hr NG Glycol Reboiler	No Limit		4.2 MMCF/Yr	
1 - 100 BBL Drip Collection Tank VR				
1 - 5 BBL Covered Drip Pit				
Tank Battery No. 1				
1 - 5,000 BBL Wash Tank (T1) VR				
1 - 1,000 BBL PWT (T3) VR				
1 - 500 BBL PWT (T4) VR				
1 - 5,000 BBL LACT Tank (T2) VR				
1 - 288 Sqft Covered Sump (P4)				
1 - 4.5 MMBTU/Hr NGNatco Heater Treater UNC (SN 16388)	No Limit		37.7 MMCF/Yr	

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

<div>M:\TITLEV\LOTUS\TP_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
<div>Tank Battery No. 2</div> <div>1 - 3,000 BBL Wash Tank (T9) VR</div> <div>1 - 5,000 BBL Wash Tank (T12) VR</div> <div>1 - 3,750 BBL PWT (T10) VR</div> <div>1 - 1,000 BBL PWT (T34) VR</div> <div>1 - 3,750 BBL LACT Tank (T11) VR</div> <div>1 - 5 BBL Covered Drip Pit</div> <div>Test Location No. 7</div>				
<div>1 - 24 BBL Open TopBlowdown Tank (BD7)</div> <div>1 - 5 BBL Covered Drip Pit</div>				
<div>Test Location No. 12</div>				
<div>1 - 24 BBL Open TopBlowdown Tank (BD12)</div> <div>1 - 5 BBL Covered Drip Pit</div>				
<div>Test Location No. 20</div> <div>1 - 1,000 BBL LACT Tank (T14) VR</div> <div>1 - 1,000 BBL LACT Tank (T15) VR</div> <div>1 - 24 BBL Open TopBlowdown Tank (BD20)</div> <div>1 - 5 BBL Covered Drip Pit</div> <div>1 - 5 BBL Covered Drip Pit</div>				
<div>Test Location No. 28</div> <div>1 - 2,500 bbl Wash (T5) VR</div> <div>1 - 24 BBL Open TopBlowdown Tank (BD28)</div>				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

<div>M:\TITLEV\LOTUS\TP_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
1 - 5 BBL Covered Drip Pit				
Test Location No. 164				
1 - 24 BBL Open TopBlowdown Tank (BD164)				
1 - 5 BBL Covered Drip Pit				
Test Location No. 275				
1 - 24 BBL Open TopBlowdown Tank (BD275)				
1 - 5 BBL Covered Drip Pit				
Test Location No. 288				
1 - 24 BBL Open TopBlowdown Tank (BD288)				
1 - 5 BBL Covered Drip Pit				
Test Location No. 403				
1 - 1,000 BBL COST (T8) VR	500.0 MBBL/Yr	F	500.0 MBBL/Yr	
1 - 1,000 BBL LACT Tank (T6) VR				
1 - 1,000 BBL LACT Tank (T7) VR				
1 - 24 BBL Open TopBlowdown Tank (BD403)				
1 - 5 BBL Covered Drip Pit (Test No. 403)				
1 - 5 BBL Covered Drip Pit (Pipeyard)				
Test Location No. 408				
1 - 24 BBL Open TopBlowdown Tank (BD408)				
1 - 5 BBL Covered Drip Pit				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

<div>M:\TITLEV\LOTUS\TP_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
Test Location No. 608				
1 - 24 BBL Open Top Blowdown Tank (BD608)				
1 - 5 BBL Covered Drip Pit				
Produced Water Plant				
1 - 5,000 BBL PWT (T16) VR				
1 - 640 BBL PWT (T25) VR				
1 - 640 BBL PWT (T26) VR				
1 - 300 BBL PWT (T32) VR				
1 - 1,000 BBL PWT (Filtered) (T33) VR				
1 - 500 BBL Superior Flotation Cell (T17) VR				
1 - 500 BBL Superior Flotation Cell (T18) VR				
1 - 150 BBL Wemco Flotation Cell (T19) VR				
1 - 2,860 Sqft Flotation Cell Clarifier Sump (P19) Exempt BACT				
1 - 2,860 Sqft Spent Acid Sump (P20) Exempt BACT				
1 - 250 Sqft Filter Flush Pit (P21) Emergency Only				
1 - 250 Sqft Covered Filter Flush Clear Water Sump (P23)				
1 - 300 Sqft Cone Tower Sump (P24) Exempt BACT				
1 - 350 BBL Cone Tower with P-V Valve Exempt <5 mg/l				
Third Grubb Waterflood Plant				
1 - 5,000 BBL COST (T35) VR	50.0 MBBL/Yr	F	50.0 MBBL/Yr	
1 - 10,000 BBL PWT (T27) VR				
1 - 3,000 BBL PWT (T28) VR				
1 - 3,000 BBL PWT (T29) VR				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

<div>M:\TITLEV\LOTUS\TP_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
"59" Waterflood Plant				
1 - 5,000 BBL PWT (T30) VR				
FORMER PERMIT NO. 0005 Hobson A & Oak Grove Lease Hobson A Lease				
1 - 3000 BBL Wash Tank (East Block) VR				
1 - 3000 BBL Wash Tank ("A" Lease) VR				
1 - 1000 BBL COST (East Block No. 1) VR	54.8 MBBL/Yr	F	54.8 MBBL/Yr	
1 - 1000 BBL COST (East Block No. 2) VR	54.8 MBBL/Yr	F	54.8 MBBL/Yr	
1 - 2000 BBL COST (Standby) VR	0.0 MBBL/Yr	F	0.0 MBBL/Yr	
1 - 2000 BBL PWT ("A", Oakgrove, and East Block) VR				
1 - 750 BBL PWT (Filtered) (Exempt < 5 mg/l)				
1 - 2000 BBL LACT Tank ("A", Oakgrove, and East Block) VR				
1 - 375 Sqft Covered Sump				
Oak Grove Lease				
1 - 2000 BBL Wash Tank (No. 3) VR				
1 - 2000 BBL LACT Tank (No. 1) VR				
1 - 2000 BBL LACT Tank (No. 2) VR				
1 - Crude Oil Loading Facility BL VR	3571 BBL/Yr	F	3570 BBL/Yr	
1 - 375 Sqft Covered Sump				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0008P Equipment 29-Apr-98	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
FORMER PERMIT NO. 0320 Padre Canyon Lease				
1 - 3,000 BBL Wash Tank (No. 7850) VR				
1 - 400 BBL PWT (No. 6889) VR				
1 - 1,500 BBL PWT (TVP < 0.5 PSIA) UNC				
1 - 2,000 BBL LACT Tank (6888) VR				
1 - 100 BBL Prod Transfer Tank VR				
1 - 100 BBL Prod Transfer Tank VR				
1 - 150 BBL Drain TANK (TVP < 0.5 PSIA) UNC				
1 - 2.0 MMBTU/Hr B.S. & B. NG Line Heater UNC	No Limit		16.7 MMCF/Yr	
FORMER PERMIT NO. 0347 Hobson B Lease, Site No. 1				
1 - 2000 BBL COST (B-50) VR	185.0 MBBL/Yr	F	185.0 MBBL/Yr	
1 - 375 SqFt Pit (Emergency)				
Main Tank Battery, Hobson C Lease				
1 - 1500 BBL Wash Tank VR				
1 - 3000 BBL COST (No. 20X1222) VR	36.5 MBBL/Yr	F	36.5 MBBL/Yr	
1 - 2000 BBL COST (No. 20X445) VR (standby)	0.0 MBBL/Yr	F	0.0 MBBL/Yr	
1 - 1500 BBL LACT Tank No. 6 VR				
1 - 1500 BBL LACT Tank No. 5 VR				
1 - 2000 BBL Slop Tank (No. 20X444) VR	6.0 MBBL/Yr	F	6.0 MBBL/Yr	
1 - Crude Oil Loading Facility BL VR	3500 BBL/Yr	F	3500 BBL/Yr	
Water Treatment Tank Battery Hobson C Lease				
1 - 2000 BBL PWT (Blend) VR				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Throughput/Consumption Limits

<div>M:\TITLEV\LOTUS\TP_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
<div>1 - 1500 BBL PWT (Backwash) VR</div> <div>1 - 16,000 BBL PWT (Divert, TVP < 0.5 psia) UNC</div> <div>1 - 2000 BBL PWT (Filtered) VR</div> <div>1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l</div> <div>1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l</div> <div>Water Treatment Facility</div> <div>Hobson C Lease</div>				
1 - 173 BBL WEMCO PWT (No. 76) VR				
1 - 120 BBL Slop Tank (No. 3) VR	1.2 MBBL/Yr	F	1.2 MBBL/Yr	
1-181 BBL Open Top Flotation Cell (No. 1) Exempt < 5 mg/l				
1 - 120 BBL Open Top Flotation Cell (No. 2) Standby, Exempt < 5 mg/l				
1 - 970 Sqft Covered Second Stage Sump				
1 - 360 Sqft Pit (Emergency)				
1 - 360 Sqft Pit (Emergency)				
1 - 240 Sqft 3rd Stage Pit (Emergency)				
1 - 72 Sqft Covered Waste Oil/Water Pit				
1 - 3.15 MMBTU/Hr NG Superior HeaterTreater UNC	1.0 MMCF/Yr	F	1.0 MMCF/Yr	
1 - 4.25 MMBTU/Hr NG Superior HeaterTreater UNC	*	F	*	

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 0008 Permitted Throughput/Consumption Limits				
M:\TITLEV\LOTUS\TP_0008P Equipment 29-Apr-98	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
For Use Throughout Leases				
448 - Oil Wells				
1 - 90 BHP Rich Burn NG Waukesha Engine (S/N 265997) NSCR	7.5 MMCF/Yr	F	7.5 MMCF/Yr	
1 - 90 BHP Rich Burn NG Engine (Standby) (S/N 250679) UNC	0.2 MMCF/Yr	F	0.2 MMCF/Yr	
40 - 500 BBL Portable Closed Top Tanks				
4 - 500 BBL Portable Open Top Mixing Tanks				
Solvent Wipe Cleaning Operations	45,664 Lbs ROC/Yr (22.83 TPY)	F	***	
* - Included in Limit Above ** - Total Fuel Limit for Centaur Turbine Based on Natural Gas Heating Value of 1050 BTU/CF and Diesel Heating Value of 141,000 BTU/Gal. ** - Calculation Throughput is Based on the Types of Solvents, Their ROC Content, and Quantities Presented in the Table Below				

***		Solvent Density (lb/gal)	Quantity (Gallons)
	Type of Solvent		
	Mineral Spirits	6.5	7000
	Citrikleen	4.09	40

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Enforceability of Permitted Emissions

The permitted emissions in the units of tons per year and pounds per hour listed in the permitted emissions table are not directly enforceable as permit conditions. Other permit conditions listed in the permit, however, are designed to limit the emissions from this stationary source to the limits in the table.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is referenced in the permit application and is maintained by the stationary source.

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Emissions

M:\TITLEV\LOTUS\PE_0008P 29-Apr-98 Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
FORMER PERMIT NO. 0008 GRUBB LEASE										
1 - 5 BBL Covered Drip Pit (Centaur Generator)	0.04					0.01				
1 - 5 BBL Covered Drip Pit (AmphitheaterWaterflood)	**					**				
1 - 4686 BHP (3.3 MW) Solar Centaur H NG/FO Turbine Generator	1.94	19.15	4.00	0.94	4.20	1.12	16.85	2.70	36.00	3.39
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428688)	0.76	16.28	2.04	0.05	11.58	0.17	3.72	0.46	0.01	2.64
1 - 1200 BHP (0.85 MW) Solar NG Turbine Generator (S/N S428689)	*	*	*	*	*	*	*	*	*	*
Grubb Lease Compressor Plant										
1 - Glycol Dehydrator System consisting of:										
1 - Glycol Dehydrator Vent VR	7.99					1.82				
1 - 0.497 MMBtu/Hr NG Glycol Reboiler	0.01	0.21	0.01	0.00	0.04	0.00	0.05	0.00	0.00	0.01
1 - 100 BBL Drip Collection Tank VR	<0.01					<0.01				
1 - 5 BBL Covered Drip Pit	**					**				
Tank Battery No. 1										
1 - 5,000 BBL Wash Tank (T1) VR	0.14					0.03				
1 - 1,000 BBL PWT (T3) VR	0.06					0.01				
1 - 500 BBL PWT (T4) VR	0.04					0.01				
1 - 5,000 BBL LACT Tank (T2) VR	0.25					0.06				
1 - 288 Sqft Covered Sump (P4)	0.05					0.01				
1 - 4.5 MMBTU/Hr NGNatco Heater Treater UNC (SN 16388)	0.10	1.89	0.06	0.01	0.38	0.02	0.43	0.01	0.00	0.09
Tank Battery No. 2										
1 - 3,000 BBL Wash Tank (T9) VR	0.06					0.01				

Permitted Emissions

Test Location No. 164

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Emissions

<div>M:\TITLEV\LOTUS\PE_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 24 BBL Open TopBlowdown Tank (BD164)	0.11					0.50				
1 - 5 BBL Covered Drip Pit	**					**				
Test Location No. 275										
1 - 24 BBL Open TopBlowdown Tank (BD275)	0.11					0.50				
1 - 5 BBL Covered Drip Pit	**					**				
Test Location No. 288										
1 - 24 BBL Open TopBlowdown Tank (BD288)	0.11					0.50				
1 - 5 BBL Covered Drip Pit	**					**				
Test Location No. 403										
1- 1,000 BBL COST (T8) VR	1.24					0.28				
1- 1,000 BBL LACT Tank (T6) VR	0.11					0.02				
1- 1,000 BBL LACT Tank (T7) VR	*					*				
1 - 24 BBL Open TopBlowdown Tank (BD403)	0.11					0.50				
1 - 5 BBL Covered Drip Pit (Test No. 403)	**					**				
1 - 5 BBL Covered Drip Pit (Pipeyard)	**					**				
Test Location No. 408										
1 - 24 BBL Open TopBlowdown Tank (BD408)	0.11					0.50				
1 - 5 BBL Covered Drip Pit	**					**				
Test Location No. 608										
1 - 24 BBL Open TopBlowdown Tank (BD608)	0.11					0.50				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Emissions

<div>M:\TITLEV\LOTUS\PE_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 5 BBL Covered Drip Pit	**					**				
Produced Water Plant										
1- 5,000 BBL PWT (T16) VR	0.14					0.03				
1- 640 BBL PWT (T25) VR	0.02					<0.01				
1- 640 BBL PWT (T26) VR	*					*				
1 - 300 BBL PWT (T32) VR	0.01					<0.01				
1- 1,000 BBL PWT (Filtered) (T33) VR	0.01					<0.01				
1- 500 BBL Superior Flotation Cell (T17) VR	0.05					0.01				
1- 500 BBL Superior Flotation Cell (T18) VR	*					*				
1- 150 BBL Wemco Flotation Cell (T19) VR	0.01					<0.01				
1- 2,860 Sqft Flotation Cell Clarifier Sump (P19) Exempt BACT	10.44					2.38				
1- 2,860 Sqft Spent Acid Sump (P20) Exempt BACT	*					*				
1- 250 Sqft Filter Flush Pit (P21) Emergency Only	0.04					0.10				
1- 250 Sqft Covered Filter Flush Sump (P23)	0.05					0.01				
1- 300 Sqft Cone Tower Sump (P24) Exempt BACT	0.55					0.13				
1 - 350 BBL Cone Tower with P-V Valve Exempt <5 mg/l	0.03					0.01				
Third Grubb Waterflood Plant										
1 - 5,000 BBL COST (T35) VR	0.75					0.17				
1 - 10,000 BBL PWT (T27) VR	0.38					0.09				
1 - 3,000 BBL PWT (T28) VR	0.11					0.02				
1 - 3,000 BBL PWT (T29) VR	0.03					0.01				
"59" Waterflood Plant										
1 - 5,000 BBL PWT (T30) VR	0.06					0.01				

Permitted Emissions

[illegible]

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0008
Permitted Emissions

Permit to Operate No. 0008 Permitted Emissions

Permitted Emissions	
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[illegible]

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 0008

Permitted Emissions

<div>M:\TITLEV\LOTUS\PE_0008P</div> <div>29-Apr-98</div> <div>Equipment</div>	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 2000 BBL PWT (Blend) VR	0.13					0.03				
1 - 1500 BBL PWT (Backwash) VR	0.07					0.02				
1 - 16,000 BBL PWT (Divert, TVP < 0.5 psia) UNC	0.60					0.14				
1 - 2000 BBL PWT (Filtered) VR	0.13					0.03				
1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l	<0.01					<0.01				
1 - 750 BBL PWT (Filtered) Exempt < 5 mg/l	*					*				
Water Treatment Facility Hobson C Lease										
1 - 173 BBL WEMCO PWT (No. 76) VR	0.03					0.01				
1 - 120 BBL Slop Tank (No. 3) VR	0.02					<0.01				
1-181 BBL Open Top Flotation Cell (No. 1) Exempt < 5 mg/l	<0.01					<0.01				
1 - 120 BBL Open Top Flotation Cell (No. 2) Standby	0.13					0.03				
1 - 970 Sqft Covered Second Stage Sump	0.18					0.04				
1 - 360 Sqft Pit (Emergency)	0.11					0.30				
1 - 360 Sqft Pit (Emergency)	*					*				
1 - 240 Sqft 3rd Stage Pit (Emergency)	0.04					0.10				
1 - 72 Sqft Covered Waste Oil/Water Pit	0.01					<0.01				
1 - 3.15 MMBTU/Hr NG Superior HeaterTreater UNC	0.00	0.05	0.00	0.00	0.01	0.04	0.70	0.02	0.00	0.14
1 - 4.25 MMBTU/Hr NG Superior HeaterTreater UNC	*	*	*	*	*	*	*	*	*	*
For Use Throughout Leases										
448 - Oil Wells	163.54					37.33				
1 - 90 BHP Rich Burn NG Waukesha Engine (S/N 265997) NSCR	0.45	0.73	0.04	0.00	23.28	X	X	X	X	5.57
1 - 90 BHP Rich Burn NG Engine (Standby) (S/N 250679) UNC	0.02	0.21	0.00	0.00	0.03	0.21	2.14	0.01	0.00	X
40 - 500 BBL Portable Closed Top Tanks	10.97					2.50				
4 - 500 BBL Portable Open Top Mixing Tanks	0.14					0.03				
Mineral Spirits Solvent Wipe Cleaning	22.75					5.20				
Water Soluble Solvent Wipe Cleaning	0.08					0.02				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT**Permit to Operate No. 0008****Permitted Emissions**

M:\TITLEV\LOTUS\PE_0008P 29-Apr-98 Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
* - Included in Emissions Above ** - Included in Emissions for the 5 BBL Covered Drip Pit (Centaur Generator)										
Total Permitted Emissions	230.58	38.83	6.18	1.01	39.69	61.55	23.96	3.21	36.01	11.88
HAP Emissions Ref.: AB 2588 Air Toxics Report	Reporting Year: 1995					Submittal Date: 10/15/96				

5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are made, the permit holder is required to maintain a copy of the revised oil well list at the facility and to submit a copy of the revised oil well list to the District.

A revision to this permit is required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list. Other revisions to the oil well list will not require a revision to this permit.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

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Ventura County Air Pollution Control District

OIL WELL LIST

Permit to Operate No. 0008

The following oil wells are on permit with Vintage Petroleum's Rincon Area Leases:

Grubb Lease Wells

GRUBB	5	GRUBB	163	GRUBB	296	GRUBB	368	GRUBB	502
GRUBB	7	GRUBB	166	GRUBB	298	GRUBB	369	GRUBB	503
GRUBB	8	GRUBB	167	GRUBB	299	GRUBB	370	GRUBB	564
GRUBB	11	GRUBB	168	GRUBB	301	GRUBB	372	GRUBB	603
GRUBB	18	GRUBB	169	GRUBB	303	GRUBB	374	GRUBB	604
GRUBB	22	GRUBB	171	GRUBB	306	GRUBB	375	GRUBB	606
GRUBB	23	GRUBB	172	GRUBB	307	GRUBB	376	GRUBB	608
GRUBB	30	GRUBB	175	GRUBB	308	GRUBB	377	GRUBB	609
GRUBB	35	GRUBB	180	GRUBB	309	GRUBB	378	GRUBB	610
GRUBB	37	GRUBB	181	GRUBB	311	GRUBB	379	GRUBB	701
GRUBB	46	GRUBB	182	GRUBB	312	GRUBB	380	GRUBB	703
GRUBB	50	GRUBB	200	GRUBB	313	GRUBB	381	GRUBB	704
GRUBB	55	GRUBB	202	GRUBB	314	GRUBB	384	GRUBB	705
GRUBB	58	GRUBB	203	GRUBB	315	GRUBB	386	GRUBB	707
GRUBB	59	GRUBB	204	GRUBB	316	GRUBB	387	GRUBB	708
GRUBB	66	GRUBB	205	GRUBB	318	GRUBB	388	GRUBB	709
GRUBB	68	GRUBB	206	GRUBB	319	GRUBB	391	GRUBB	801
GRUBB	74	GRUBB	207	GRUBB	321	GRUBB	392	GRUBB	802
GRUBB	81	GRUBB	208	GRUBB	323	GRUBB	395	GRUBB	803
GRUBB	82	GRUBB	209	GRUBB	324	GRUBB	396		
GRUBB	92	GRUBB	210	GRUBB	327	GRUBB	402		
GRUBB	93	GRUBB	214	GRUBB	328	GRUBB	404		
GRUBB	95	GRUBB	231	GRUBB	340	GRUBB	405		
GRUBB	96	GRUBB	234	GRUBB	341	GRUBB	406		
GRUBB	97	GRUBB	240	GRUBB	343	GRUBB	410		
GRUBB	98	GRUBB	241	GRUBB	345	GRUBB	411		
GRUBB	100	GRUBB	242	GRUBB	346	GRUBB	412		
GRUBB	102	GRUBB	243	GRUBB	351	GRUBB	414		
GRUBB	110	GRUBB	244	GRUBB	352	GRUBB	415		
GRUBB	111	GRUBB	245	GRUBB	353	GRUBB	451		
GRUBB	112	GRUBB	248	GRUBB	354	GRUBB	452		
GRUBB	113	GRUBB	250	GRUBB	356	GRUBB	453		
GRUBB	114	GRUBB	251	GRUBB	357	GRUBB	455		

GRUBB	115	GRUBB	257	GRUBB	358	GRUBB	456
GRUBB	139	GRUBB	272	GRUBB	359	GRUBB	457
GRUBB	151	GRUBB	273	GRUBB	360	GRUBB	458
GRUBB	153	GRUBB	275	GRUBB	361	GRUBB	459
GRUBB	154	GRUBB	276	GRUBB	362	GRUBB	460
GRUBB	155	GRUBB	283	GRUBB	363	GRUBB	461
GRUBB	156	GRUBB	287	GRUBB	364	GRUBB	462
GRUBB	157	GRUBB	288	GRUBB	365	GRUBB	463
GRUBB	159	GRUBB	289	GRUBB	366	GRUBB	464
GRUBB	160	GRUBB	295	GRUBB	367	GRUBB	501

Hobson A Lease Wells

HOBSON	A-1	HOBSON	A-12	HOBSON	A-36
HOBSON	A-2	HOBSON	A-15	HOBSON	A-38
HOBSON	A-4	HOBSON	A-16	HOBSON	A-39
HOBSON	A-4-1	HOBSON	A-17	HOBSON	A-40
HOBSON	A-5	HOBSON	A-19	HOBSON	A-41
HOBSON	A-6	HOBSON	A-20	HOBSON	A-42
HOBSON	A-6-1	HOBSON	A-23	HOBSON	A-43
HOBSON	A-7	HOBSON	A-24	HOBSON	A-44
HOBSON	A-8	HOBSON	A-27	HOBSON	A-45
HOBSON	A-8-1	HOBSON	A-28	HOBSON	A-46
HOBSON	A-8-2	HOBSON	A-28-1	HOBSON	A-47
HOBSON	A-9	HOBSON	A-29	HOBSON	A-48
HOBSON	A-10	HOBSON	A-31	HOBSON	A-49
HOBSON	A-10-1	HOBSON	A-35	OAK GROVE	1 East
HOBSON	A-10-2	HOBSON	A-35-1	OAK GROVE	8 East
HOBSON	A-11				

Oak Grove Lease Wells

OAK GROVE	2	OAK GROVE	7-3
OAK GROVE	2-1	OAK GROVE	9
OAK GROVE	2-2	OAK GROVE	9-1
OAK GROVE	2-3	OAK GROVE	9-2
OAK GROVE	3	OAK GROVE	10
OAK GROVE	3-1	OAK GROVE	11
OAK GROVE	3-2	OAK GROVE	12
OAK GROVE	7	OAK GROVE	13
OAK GROVE	7-2		

Padre Canyon Lease Wells

PADRE	1	PADRE	24	PADRE	58
PADRE	2	PADRE	25	PADRE	59
PADRE	3	PADRE	26	PADRE	60
PADRE	5	PADRE	27	PADRE	64
PADRE	6	PADRE	28	PADRE	70
PADRE	8	PADRE	29	PADRE	71
PADRE	9	PADRE	30	PADRE	100
PADRE	11	PADRE	50	PADRE	101

PADRE	12	PADRE	51	PADRE	102
PADRE	13	PADRE	52	PADRE	103
PADRE	14	PADRE	53	PADRE	104
PADRE	15	PADRE	54	PADRE	105
PADRE	16	PADRE	55	PADRE	106
PADRE	21	PADRE	56	PADRE	108
PADRE	22	PADRE	57	PADRE	107-A
PADRE	23				

Hobson B and Hobson C Lease Wells

HOBSON	B-1	HOBSON	B-30	HOBSON	B-78
HOBSON	B-2	HOBSON	B-30-1	HOBSON	B-79
HOBSON	B-3	HOBSON	B-30-2	HOBSON	B-81
HOBSON	B-4	HOBSON	B-30-3	HOBSON	B-90
HOBSON	B-5	HOBSON	B-30-4	HOBSON	B-100
HOBSON	B-6	HOBSON	B-31	HOBSON	B-100-1
HOBSON	B-7	HOBSON	B-32	HOBSON	B-101
HOBSON	B-8	HOBSON	B-33	HOBSON	B-102
HOBSON	B-8-1	HOBSON	B-34-1	HOBSON	B-110
HOBSON	B-9	HOBSON	B-35-1	HOBSON	B-120
HOBSON	B-9-1	HOBSON	B-35-2	HOBSON	B-121
HOBSON	B-10A	HOBSON	B-35-3	HOBSON	B-123
HOBSON	B-11	HOBSON	B-36	HOBSON	B-124
HOBSON	B-12	HOBSON	B-37	HOBSON	B-130
HOBSON	B-13	HOBSON	B-37-1	HOBSON	B-132
HOBSON	B-14	HOBSON	B-37-2	HOBSON	B-150
HOBSON	B-15	HOBSON	B-38	HOBSON	B-150-1
HOBSON	B15-1	HOBSON	B-38-1	HOBSON	B-160
HOBSON	B-16	HOBSON	B-39-1	HOBSON	B-161
HOBSON	B-17	HOBSON	B-41	HOBSON	B-161-1
HOBSON	B-17-1	HOBSON	B-42	HOBSON	B-162
HOBSON	B-18	HOBSON	B-42-1	HOBSON	B-163
HOBSON	B-18-1	HOBSON	B-46-1	HOBSON	B-163-1
HOBSON	B18-2	HOBSON	B-47	HOBSON	B-167
HOBSON	B-19	HOBSON	B-47-1	HOBSON	B-167-1
HOBSON	B-19-1	HOBSON	B-48-1	HOBSON	B-167-2
HOBSON	B-20	HOBSON	B-50	HOBSON	B-170
HOBSON	B-21	HOBSON	B-51	HOBSON	B-171
HOBSON	B-22	HOBSON	B-51-1	HOBSON	B-190
HOBSON	B-23	HOBSON	B-51-2		
HOBSON	B-24	HOBSON	B-52-1	HOBSON	C-2
HOBSON	B-24-1	HOBSON	B-53	HOBSON	C-3
HOBSON	B-24-2	HOBSON	B-55	HOBSON	C-4
HOBSON	B-24-3	HOBSON	B-56	HOBSON	C-5
HOBSON	B-25	HOBSON	B-57	HOBSON	C-6
HOBSON	B-25-1	HOBSON	B-58	HOBSON	C-8
HOBSON	B-25-2	HOBSON	B-59	HOBSON	C-9
HOBSON	B-25-3	HOBSON	B-60	HOBSON	C-10A
HOBSON	B-26	HOBSON	B-61	HOBSON	C-11

HOBSON	B-26-1	HOBSON	B-61-1	HOBSON	C-12
HOBSON	B-27-1	HOBSON	B-63	HOBSON	C-13
HOBSON	B-27-2	HOBSON	B-64	HOBSON	C-14
HOBSON	B-28	HOBSON	B-70	HOBSON	C-15
HOBSON	B-28-1	HOBSON	B-71	HOBSON	C-16
HOBSON	B-28-2	HOBSON	B-72	HOBSON	C-17
HOBSON	B-29	HOBSON	B-73-A	HOBSON	C-18
HOBSON	B-29-1	HOBSON	B-74	HOBSON	C-19
HOBSON	B-29-2	HOBSON	B-75	HOBSON	C-20
HOBSON	B-29-3	HOBSON	B-76	HOBSON	C-21
HOBSON	B-29-4	HOBSON	B-77		

6. EXEMPT EQUIPMENT LIST

Under the District's Title V Federal Operating Permit Program, insignificant activities have been defined to be equivalent to the operations, equipment, or emissions units that are exempt from permit as detailed in APCD Rule 23, "Exemptions From Permit". APCD Rule 33.2.A.11 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to APCD Rule 23 based on size or production rate.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in VCAPCD Rule 23, "Exemptions From Permit".

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in APCD Rule 33.2.A.11, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

Form TVAF50/05-22-96

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7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No. or CFR No.) #” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

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Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation"

Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.
3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.
5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

**Ventura County Air Pollution Control District
Rule 71.1.B.2 Applicable Requirements
Tanks Exempt from Vapor Recovery
Equipped With Roof and Pressure-Vacuum Relief Valve
Low Vapor Pressure Exemption**

Rule 71.1, "Crude Oil Production and Separation"
Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to tanks that are exempt from the vapor recovery requirements of Section B.1 of Rule 71.1 pursuant to the exemption of Rule 71.1.D.1.a. The exemption states that vapor recovery is not required if the tank battery was installed prior to June 20, 1978, for the purpose of processing crude oil having a modified Reid vapor pressure at the initial storage tank entry point of less than 0.5 psia. Specifically, this attachment applies to all storage tanks in a tank battery, including wash tanks, produced water tanks, and wastewater separators which meet the above exemption and are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.D.1.a, the modified Reid vapor pressure of the crude oil at the initial storage tank entry point of the tank battery shall not exceed 0.5 psia.

2. Pursuant to Rule 71.1.B.2.a, all tanks shall be equipped with a solid roof and shall be maintained in good condition.
3. Pursuant to Rule 71.1.B.2.b, all tanks shall be equipped with sealed hatches and pressure-vacuum relief valves. Each pressure-vacuum relief valve shall be set to at least 90 percent of the maximum allowable pressure and vacuum rating for the tank.
4. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
5. On an annual basis, permittee shall certify that an applicable tank is in compliance with Rules 71.1.B.2 and 71.1.D.1.a. This annual compliance certification shall include verifying the integrity of the roof and pressure-vacuum relief valve.
6. Pursuant to Rule 71.1.E.1, any person wishing to operate pursuant to the exemption of Rule 71.1.D.1.a, shall keep records to substantiate the applicability of the exemption and submit these records to the District upon request. Such records shall include, for any crude oil, the modified Reid vapor pressure in psi absolute at the initial storage tank entry point.

Pursuant to Rule 71.1.F.2, the modified Reid vapor pressure shall be determined using Test Method for Vapor Pressure for Petroleum Products, ASTM D 323-82 conducted at the sample crude oil temperature equal to the temperature of the crude oil at the storage tank entry point.

Ventura County Air Pollution Control District
Rule 71.1.D.3 Applicable Requirements
Tanks Exempt from Vapor Recovery
Tanks Exempt From Roof and Pressure-Vacuum Relief Valve
Low ROC Content Exemption

Rule 71.1, "Crude Oil Production and Separation"

Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to tanks that are exempt from the vapor recovery requirements of Section B.1 of Rule 71.1, and the solid roof and pressure-vacuum relief valve requirement of Section B.2 of Rule 71.1, pursuant to the exemption of Rule 71.1.D.3. The exemption states that vapor recovery, a solid roof, and a pressure-vacuum relief valve are not required if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. Specifically, this attachment applies to all storage tanks in a tank battery, including wash tanks, produced water tanks, and wastewater separators which meet the above exemption and are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.D.3, the ROC content of liquid entering a tank shall not exceed 5 milligrams per liter.

2. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
3. Permittee shall perform routine surveillance of the applicable tank to ensure that compliance with Rule 71.1.D.3 is being maintained. This routine surveillance shall include verifying that there is no change in the tank contents or method of operation.
4. Under the authority of Rule 71.1.E.2, the District shall require any person claiming an exemption pursuant to Rule 71.1.D.3 to validate the exemption for each tank on an annual basis. Records of such validation shall be maintained at the facility, and shall be submitted to the District, in writing, with the annual compliance certification, and shall include the results of an independent laboratory analysis.

Pursuant to Rule 71.1.F.3, the ROC content of crude oil in milligrams per liter shall be determined by EPA Method 8015. Samples will be analyzed using purge and trap (EPA Method 5030), and stock standards will be prepared from gasoline. Sampling shall occur at the entry point of the device.

Ventura County Air Pollution Control District
Rule 71.1.B.3 Applicable Requirements
Portable Tank Requirements

Rule 71.1, "Crude Oil Production and Separation"

Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to tanks designated on the Permit to Operate as portable, and used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. A portable tank is defined as a tank that can be moved from one location to another by attachment to a motor vehicle without having to be dismantled. A tank is further defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.3, portable tanks used to store or hold crude oil shall be equipped with both a closed cover that is impermeable to ROC vapors and a pressure-vacuum valve set by the manufacturer or according to the manufacturer's recommendations. A portable tank shall be defined as a tank that can be moved from one location to another by attachment to a motor vehicle without having to be dismantled.

2. Pursuant to Rule 71.1.D.1.c, the vapor recovery provisions of Rule 71.1.B.1 shall not apply to portable tanks if all of the following conditions are met:
 - i. The portable tank is not used to increase the storage capacity of an existing tank battery.
 - ii. The portable tank is not located within 150 feet of a tank battery that is subject to the vapor recovery provisions of Rule 71.1.B.1.
 - iii. The portable tank is being used during maintenance activity at a tank battery or well and has not held or stored crude oil for more than 60 days.
3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
4. On an annual basis, permittee shall certify that portable tanks at the facility are complying with Rule 71.1.B.3. This compliance certification shall include verifying the integrity of the roof and pressure-vacuum relief valve.

For portable tanks that are not permanently located at the facility, permittee shall maintain records to show that the integrity of the roof and pressure-vacuum relief valve were verified when the tank was brought to the facility.

5. Pursuant to Rule 71.1.E.3, any person claiming the exemption of Rule 71.1.D.1.c for any portable tank shall maintain records indicating the number of days the tank has stored or held crude oil during the maintenance operation. In addition, the location of the portable tank relative to a tank battery, and whether the tank was connected to vapor recovery shall be indicated. These records shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 71.3.B.1 Applicable Requirements
ROC Liquid Loading Facilities
Tanks Exempt From Vapor Recovery Requirements
Low Throughput Exemption

Rule 71, "Crude Oil and Reactive Organic Compound Liquids"
Adopted 12/13/94, Federally-Enforceable

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to equipment used to transfer reactive organic compound (ROC) liquids with a Modified Reid Vapor Pressure (MRVP) greater than or equal to 0.5 psia. This attachment does not apply to the transfer of gasoline, or to the transfer of ROC liquids via pipeline.

Specifically, this attachment applies to loading facilities where the total ROC liquid throughput is less than 20,000 gallons per day (476 barrels per day) of ROC liquid with a MRVP of 1.5 psia or higher and less than 150,000 gallons per year (3,571 barrels per year) with a MRVP of 0.5 psia or higher.

A loading facility is defined as any aggregation or combination of organic liquid loading equipment which is located so that all the organic liquid loading outlets for such aggregation or combination of loading equipment can be encompassed within any circle of 300 feet in diameter.

Conditions:

1. Pursuant to Rule 71.3.B.1, no person shall transfer ROC liquids into any ROC liquid delivery vessel without either using a submerged fill pipe or bottom loading.
2. Pursuant to Rule 71.3.B.2, the vapor recovery, overfill protection, and spill prevention requirements of Rule 71.3.B.2 shall not apply to a loading facility where the total ROC liquid throughput is less than 20,000 gallons per day (476 barrels per day) of ROC liquid with a MRVP of 1.5 psia or higher, or less than 150,000 gallons per year (3,571 barrels per year) with a MRVP of 0.5 psia or higher.

3. Pursuant to Rule 71.3.B.3, any loading operation equipment or other equipment required by Rule 71.3 shall not leak.

As detailed in Rule 71.B.14, a “gas leak” exists when a reading in excess of 10,000 ppm, as methane, above background, is obtained using an appropriate portable hydrocarbon analyzer and when sampling is performed according to the procedures specified in EPA Method 21 - Appendix A 40 CFR Section 3.2.1. A “liquid leak” exists when the dripping of liquid containing reactive organic compounds at a rate of more than three (3) drops per minute is observed.

4. Pursuant to Rule 71.3.D.3, any leak detected shall be repaired to a leak-free state. This repair shall be done as soon as practicable but no later than 5 calendar days from the detection date.
5. On an annual basis, permittee shall certify that the applicable loading facility is in compliance with Rules 71.3.B.1 and 71.3.B.3. This annual compliance certification shall include assuring proper filling, that the equipment is leak free, and that there is no change in the tank contents or method of operation.
6. Pursuant to Rule 71.3.F.2, any person claiming exemption from the vapor recovery requirements of Rule 71.3.B.2 based on the throughput of ROC liquids shall maintain adequate records to substantiate that exemption and submit these records to the District upon request. These records shall, at a minimum, include the following:
 - a. Identification and location of all loading facilities where ROC liquids are loaded into an ROC delivery vessel. Indicate and identify if two or more of the loading equipment outlets are located within a circle having a diameter of 300 feet.
 - b. A record of the gallons of ROC liquid loaded into an ROC delivery vessel on a daily basis and on an annual basis for each loading facility exempt from the vapor recovery requirements of Rule 71.3.B.2. This shall include operator's initials, date of loading operation, the MRVP of the liquid being transferred, and method of determining throughput for each loading operation.
7. Pursuant to Rule 71.3.G.1, the vapor pressure of petroleum products shall be measured using a modified Reid vapor pressure at product transfer temperature. The Reid method is defined by the ASTM Method No. D-323-82 Volume 5.01, Section 5.

**Ventura County Air Pollution Control District
Rule 71.4.B.2 Applicable Requirements
Sumps, Pits, and Ponds With Covers**

**Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 6/8/93, Federally-Enforceable**

**Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 6/16/92, Federally-Enforceable**

Applicability:

This attachment applies to second or third stage sumps, pits, and ponds at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored. The cover's sealing mechanism and other inlet and outlet piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

A sump, pit, or pond is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand or other material in petroleum production operations". A pit is further defined as "used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit". A pond is further defined as "used to contain produced water from petroleum production processes for disposal or re-use. Ponds are not used for oil/water separation or evaporation".

Conditions:

1. Pursuant to Rule 71.4.B.2, no person shall use a second or third stage sump, pit, or pond unless it is equipped with a properly installed and maintained cover which does not leak, which is impermeable to ROC vapors, and which covers at least 90 percent of the liquid surface area of the sump, pit, or pond. All covers shall be closed at all times except during sampling or attended maintenance operations.
2. Pursuant to Rule 71.4.C.2, the cover requirements of Rule 71.4.B.2 shall not apply during maintenance operations on sumps or pits if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation, and if the maintenance operation will take no more than 24 hours to complete. Pursuant to Rule 71.4.D.3, any person claiming an exemption from the cover

requirements of Rule 71.4.B.2, based on Rule 71.4.C.2, shall maintain records of maintenance to justify the exemption and submit these records to the District upon request.

3. The cover's sealing mechanism and other inlet and outlet piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at sumps, pits, and ponds ensures compliance with the maintenance and leak-free requirements of Rule 71.4.B.2.
4. On an annual basis, permittee shall certify that sumps, pits, and ponds at the facility are complying with Rule 71.4.B.2. This annual compliance certification shall include verifying the integrity of the cover.

Ventura County Air Pollution Control District
Rule 71.4.C.1.b Applicable Requirements
Emergency Pits

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 6/8/93, Federally-Enforceable

Applicability:

This attachment applies to emergency pits at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored. Pursuant to Rule 71.4.C.1.b, emergency pits are exempt from the provisions of Rule 71.4 if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.

An emergency pit is "a pit used less than thirty (30) days per year to contain emergency releases of petroleum material. An emergency pit is dry when not in use". A pit is defined as a "receptacle, formed primarily of earthen materials, although it may be lined with artificial materials, used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit".

Conditions:

1. Pursuant to Rule 71.4.C.1.b, permittee shall implement clean-up procedures within 24 hours after each emergency occurrence and shall complete the clean-up procedures within fifteen (15) calendar days. An emergency pit shall be used less than thirty (30) days per year to contain emergency releases of petroleum material and shall be dry when not in use.
2. On an annual basis, permittee shall certify that an applicable pit is in compliance with Rule 71.4.C.1.b. This annual compliance certification shall include verifying that the pit is used only for emergency service.
3. Pursuant to Rule 71.4.D.3, any person claiming an exemption from the cover requirements of Rule 71.4.B.2, based on Rule 71.4.C.1.b, shall maintain records of emergency pit use and clean-up procedures to justify the exemption.

Ventura County Air Pollution Control District
Rule 71.4.C.1.d Applicable Requirements
Sumps, Pits, and Ponds Without Covers
Cost Effectiveness Exemption
Grubb Lease Produced Water Plant Sumps

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 6/8/93, Federally-Enforceable

Applicability:

This attachment applies to second or third stage sumps, pits, and ponds at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored and when it has been demonstrated that the maximum degree of achievable emission reduction has already taken place. Pursuant to Rule 71.4.C.1.d, a sump, pit, or pond is exempt from the provisions of Rule 71.4 if it has been demonstrated to the satisfaction of the Air Pollution Control Officer that the maximum degree of achievable emission reduction has already taken place. Each demonstration shall include a cost effectiveness evaluation conducted in accordance with "BACT Cost Effectiveness Procedures and Screening Levels for Costs" adopted by the Air Pollution Control Board on December 20, 1988.

Specifically, this attachment applies to the Flotation Cell Sludge Clarifier Sump (P19), the Spent Acid Flocculation Sump (P20), and the Filter Flush Cone Tower Solids Sump (P24) at the Grubb Lease Produced Water Plant. These requirements are in addition to any other specific or general requirements referenced in this permit.

A sump, pit, or pond is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand or other material in petroleum production operations". A pit is further defined as "used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit". A pond is further defined as "used to contain produced water from petroleum production processes for disposal or re-use. Ponds are not used for oil/water separation or evaporation".

Conditions:

1. Pursuant to Rule 71.4.C.1.d, permittee shall maintain the sumps with the same physical condition, liquid content, and method of operation as described in the cost effectiveness evaluation which demonstrated that the maximum degree of emission reduction had already taken place.

2. The cost effectiveness evaluation was based on annual emissions of 10.99 tons per year of ROC from the sumps. The annual permitted emissions from the sumps, therefore, shall not exceed 10.99 tons per year of ROC.
3. On an annual basis, the permittee shall certify that the sumps are in compliance with Rule 71.4.C.1.d. This annual compliance certification shall include a statement verifying that there is no change in physical condition, liquid contents, or method of operation of the sumps.

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Ventura County Air Pollution Control District
Rule 71.5.B.1.a.1 Applicable Requirements
Glycol Dehydrators
Closed Pipe Control System to Fuel Gas or Sales Gas System

Rule 71, "Crude Oil and Reactive Organic Compound Liquids"

Adopted 12/13/94, Federally-Enforceable

Rule 71.1, "Crude Oil Production and Separation"

Adopted 6/16/92, Federally-Enforceable

Rule 71.5, "Glycol Dehydrators"

Adopted 12/13/94, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to all glycol dehydrators, regardless of size, anywhere natural gas is dehydrated. The glycol contacts and absorbs the water vapor in the gas and becomes rich glycol. This glycol is then regenerated by distilling the water. The distilled or lean glycol is then recycled back to the absorber. The glycol regenerator vent exhausts the water vapor, aromatic hydrocarbons and other reactive organic compounds (ROC) from the rich glycol distillation.

More specifically, this attachment applies to glycol dehydrators with regenerator vents that are controlled with a condenser/vapor disposal system. This attachment applies to control systems that use a closed pipe collection system that condenses ROC emissions and directs all vapors to a fuel gas system or sales gas system.

In addition to being subject to APCD Rule 71.5, "Glycol Dehydrators", the glycol reboiler portion of the glycol dehydrator is also subject to APCD Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 1.00 MMBTU per hour, or greater; or to APCD Rule 74.15, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 5.00 MMBTU per hour, or greater.

Conditions:

1. Pursuant to Rule 71.5.B.1.a.1, no person shall operate a gas dehydration system unless the reactive organic compound (ROC) emissions from the glycol regenerator vents are controlled by a condenser/vapor disposal system that collects and condenses ROC emissions and directs all uncondensed ROC emissions to a vapor recovery/disposal system. The vapor disposal portion of the system shall consist of a system that directs all vapors to a fuel gas system or a sales gas system.
2. Pursuant to Rule 71.5.B.2, the condensed hydrocarbon liquid stream from the glycol dehydration vents shall be stored and handled in a manner that will not cause or allow the evaporation of ROC into the atmosphere, except as allowed by Section D, "Exemptions", of APCD Rule 71.1, "Crude Oil Production and Separation".
3. Pursuant to Rule 71.5.B.3, the emission control system shall be maintained in a leak-free condition.

As detailed in Rule 71.B.14, a "gas leak" exists when a reading in excess of 10,000 ppm, as methane, above background, is obtained using an appropriate portable hydrocarbon analyzer and when sampling is performed according to the procedures specified in EPA Method 21 - Appendix A of 40 CFR Section 3.2.1. A "liquid leak" exists when the dripping of liquid containing reactive organic compounds at a rate of more than three (3) drops per minute is observed.

4. The glycol dehydrator emission control system's inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the glycol dehydrator ensures compliance with the leak-free condition requirement of Rule 71.5.B.3.
5. Pursuant to Rule 71.5.D.1, the operator of any glycol unit subject to Rule 71.5 shall maintain a current file of the information necessary to assist with rule compliance and shall submit this information to the District upon request. This information, at a minimum, shall include the following:
 - a. Facility name, APCD permit number
 - b. Location, size of glycol dehydrator reboiler (MMBTU/hr), amount of gas dehydrated (MMSCFD) and type of glycol used
 - c. Description of any installed ROC control system
 - d. Flow diagram of dehydrator and any ROC controls
 - e. Maintenance records of the ROC control system

6. Permittee shall annually certify the glycol dehydrator emission control system to ensure that compliance with Rules 71.5.B.1.a.1, 71.5.B.2, and 71.5.B.3 is being maintained. This annual certification shall include a visual inspection assuring that the glycol dehydrator emission control system is a closed system, that the tank storing the condensed hydrocarbon liquid is a closed tank, and that the glycol unit is leak free.

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Ventura County Air Pollution Control District
Rules 74.9.B.1 and 74.9.B.2 Applicable Requirements
Stationary Natural Gas-Fired Rich-Burn Internal Combustion Engines
Emission Limits After January 1, 1997

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 12/21/93, Federally-Enforceable

Applicability:

This attachment applies to stationary natural gas-fired rich-burn internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". A rich-burn engine is defined by Rule 74.9 to be a two or four-stroke spark-ignited engine where the manufacturer's original recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio is less than or equal to 1.1.

More specifically, this attachment applies to all natural gas-fired rich-burn engines subject to Rule 74.9 except those with emission controls which were installed between September 5, 1989 and March 5, 1992 as detailed in the Increments of Progress of Rule 74.9.J.1.

Conditions:

1. Pursuant to Rules 74.9.B.1 and 74.9.B.2, emissions from an applicable engine shall not exceed the following limits:
 - a. Oxides of Nitrogen (NO_x expressed as NO₂), Either:
 1. 25 ppmvd referenced at 15% oxygen; or
 2. A 96% reduction by volume, as measured concurrently across an emission control device.
 - b. Reactive Organic Compounds (ROC): 250 ppmvd referenced at 15% oxygen, expressed as methane
 - c. Carbon Monoxide (CO): 4500 ppmvd referenced at 15% oxygen

These limits may be adjusted for engine efficiency as detailed in Rule 74.9.B.4. Compliance with this condition shall be verified by an annual source test, conducted in accordance with Condition No. 2.

2. The permittee shall perform an annual source test on an applicable engine utilizing the following methods as detailed in Rule 74.9.G:

a.	NO _x	ARB Method 100
b.	CO	ARB Method 100
c.	ROC	EPA Method 25 or EPA Method 18
d.	Oxygen Content	ARB Method 100
e.	Gaseous Fuel Heating Value	ASTM Method D1826-77

Source test data point intervals for ARB Method 100 tests shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes. Prior to conducting an annual emissions test, the permittee shall notify the District Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Enforcement Section within 45 days after the test.

3. Pursuant to Rule 74.9.C, the permittee shall maintain a District approved Engine Operator Inspection Plan. The plan shall include a specific emission inspection procedure to assure that the engine is operated in continual compliance with the provisions of Rule 74.9. The procedure shall include an inspection schedule. Inspections shall be conducted every quarter or after every 2,000 hours of engine operation. In no event shall the frequency of inspection be less than once per year. After an emission violation, as determined by compliance source test, the next three scheduled inspections shall include a screening analysis of the exhaust stream if a compliance source test is not required. The screening analysis shall include an examination of NO_x and CO emissions. The screening analyses shall be performed using a portable analyzer approved in writing by the District Enforcement Section.

The plan shall be updated after any change in operation. For new engines or modifications to existing engines, the plan shall be submitted to and approved by the District prior to issuance of the Permit to Operate.

4. Pursuant to Rule 74.9.E, Recordkeeping Requirements, the operator shall maintain an inspection log for each engine containing, at a minimum, the following data:
 - a. Identification and location of each engine subject to Rule 74.9;
 - b. Date and results of each emission inspection and a summary of any emissions corrective maintenance action taken; and
 - c. Any additional information required in the Engine Operator Inspection Plan.

5. Pursuant to Rule 74.9.F, Reporting Requirements, the permittee shall provide the District a report that contains the following information:
 - a. Data specifying the actual annual usage, including but not limited to, fuel consumption or hours of operation;
 - b. Data for each engine including the engine manufacturer, model number, operator identification number and location of each engine, and a summary of the maintenance and testing reports required in the "Engine Operator Inspection Plan"; and
 - c. For each engine subject to Rule 74.9, an annual source test report.

The reports shall be submitted to the District Enforcement Section.

**Ventura County Air Pollution Control District
Rule 74.9.D.2 Applicable Requirements
Stationary Internal Combustion Engines
Operated Less Than 200 Hours Per Calendar Year**

**Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 12/21/93, Federally-Enforceable**

Applicability:

This attachment applies to stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations", and operated less than 200 hours per calendar year. Pursuant to Rule 74.9.D.2, stationary internal combustion engines operated less than 200 hours per calendar year are exempt from all provisions of Rule 74.9

Conditions:

1. Pursuant to Rule 74.9.D.2, an applicable stationary internal combustion engine shall not be operated more than 200 hours per calendar year.
2. Each engine shall be equipped with a non-resettable totalizing hour meter.
3. The operator shall maintain the following records and submit them to the District upon request:
 - a. Hours of operation per calendar year for each applicable engine; and
 - b. Data for each applicable engine including the engine manufacturer, model number, operator identification number, and location of each engine.

Ventura County Air Pollution Control District
Rule 74.15.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
Equipment Currently Shut Down and Not Operating

Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"

Federally-Enforceable Version Adopted 5/11/93

Federally-Enforceable OCS Version Adopted 6/13/95

District-Enforceable Version Adopted 6/13/95

Compliance with the conditions listed below for the 6/13/95 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 1 MMBTU/Hr and less than 5 MMBTU/Hr that are currently shut down and not operating.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment which transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcining or vitrifying, any unfired waste heat recovery heater that is used to recover sensible heat from the exhaust of any combustion equipment, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Prior to operating an applicable emission unit, permittee shall:
 - a. Notify the District Enforcement Section; and

- b. Install a dedicated fuel meter pursuant to Rule 74.15.1.D.1. The meter shall be accurate to ± 1 percent, as certified by the manufacturer in writing.
- 2. Any applicable emission unit operated with an annual heat input rate of equal to or greater than 300 MMBTU and less than 1800 MMBTU shall comply with the tuning requirements of Rule 74.15.1.B.2.
- 3. Prior to operating any applicable emission unit with an annual heat input rate of equal to or greater than 1800 MMBTU, permittee shall demonstrate by source testing, using ARB Method 100 as detailed in Rule 74.15.1.E, that the unit complies with the nitrogen oxide (NO_x) and carbon monoxide (CO) limits of Rule 74.15.1.B.1. If the unit requires physical modifications in order to meet the emission limits, permittee shall apply for and receive an Authority to Construct and Permit to Operate for the modification.
- 4. Permittee shall perform routine surveillance of the applicable emission unit to ensure that the equipment is currently shut down and not operating.
- 5. Upon operating an applicable emission unit, totalizing fuel meter records shall be compiled monthly into a rolling twelve (12) calendar month report. These records shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.23.B.1 Applicable Requirements
Stationary Gas Turbines
NOx Emission Limits
3.3 MW Solar Centaur H Turbine

Rule 74.23, "Stationary Gas Turbines"
Adopted 10/10/95, Federally-Enforceable

Applicability:

This attachment applies to the 3.3 MW Solar Centaur H Turbine located at the Grubb Lease. The unit is permitted to operate on natural gas and diesel fuel.

Conditions:

1. The permittee shall comply with the following compliance schedule:
 - a. Issue contracts for a replacement or modification of turbine by February 1, 1998
 - b. Start construction/installation turbine by April 1, 1998
 - c. Complete construction/installation by May 1, 1998
 - d. Perform source test by June 1, 1998
 - e. Submit test results to District for analysis by June 15, 1998
 - f. Achieve final compliance by June 30, 1998

The permittee shall obtain any necessary District Authority to Construct prior to starting construction, modification, or replacement.

2. Pursuant to Rule 74.23.B.1, Oxides of Nitrogen (NO_x expressed as NO₂) emissions from the stationary gas turbine shall not exceed the following limits:
 - a. 25 x E/25 ppmvd while burning natural gas; where
$$E = \text{Unit Efficiency} = (\text{MRE@LHV})(\text{LHV}) / (\text{HHV})$$

LHV = the lower heating value of the fuel
HHV = the higher heating value of the fuel
MRE = manufacturer's rated thermal efficiency (continuous)
 - b. 65 ppmvd while burning diesel fuel.

These limits shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. Compliance with this condition shall be verified by an annual source test.

3. Pursuant to Rule 74.23.B.1, the turbines shall be source tested not less than once every 12 months (annually) utilizing the following methods as detailed in Rule 74.23.F:

- | | | |
|----|----------------------------|-----------------------|
| a. | NOx | EPA Method 20 |
| b. | Oxygen content | ARB Method 100 |
| c. | Fuel oil heating value | ASTM Method D 240-87 |
| d. | Gaseous fuel heating value | ASTM Method D 1826-88 |

The average of three source test runs shall be used to determine compliance. The tests shall be conducted at 30, 50, 75, and 100 percent loads.

Prior to conducting an annual emissions test, permittee shall notify the APCD Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report shall indicate the following parameters at all four loads: emissions of NOx in parts per million by volume corrected to 15% oxygen on a dry basis, pounds per hour and pounds per million BTU; the amount of excess oxygen in percent by volume; and the fuel and exhaust flow rates, in standard cubic feet per minute. The test report and results shall be submitted to the APCD Enforcement Section within 45 days after the test.

4. Pursuant to Rule 74.23.C.1.e, the NOx emission limits listed above shall not apply to the turbine during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. These exemptions shall not exceed one (1) hour. For failed start-ups, each restart shall begin a new exemption period.
5. Pursuant to Rule 74.23.B.2, the permittee shall operate, and maintain in calibration, equipment that continuously measures and records the following parameters:
 - a. control system operating parameters;
 - b. type and amount of fuel consumed; and
 - c. elapsed time of operation.

The permittee shall provide documentation, including a certified source test, correlating the control system operating parameters to the measured NOx emissions. This information may be used by the District to determine compliance. These records shall be available for inspection by the District upon request.

“Control system operating parameters” are defined as the operating parameters necessary for analysis when determining compliance. Parameters may include, but are not limited to, ammonia and exhaust gas flow rates, exhaust gas temperature, humidity, water or steam injection rate, and fuel use.

6. Pursuant to Rule 74.23.E, the permittee shall submit a report to the District Enforcement Section that contains the following information:
 - a. Actual annual fuel consumption or operating hours; and
 - b. A copy of the required annual source test report.
7. Permittee shall record and maintain the following information:
 - a. Continuous records of control system operating parameters, type and amount of fuel consumed, and elapsed time of operation, as specified in Condition No. 5 (Rule 74.23.D.1);
 - b. The value of E (unit efficiency) as defined in Condition No. 2.
 - c. The annual source test report.

These records shall be available for inspection by the District upon request.

**Ventura County Air Pollution Control District
New Source Performance Standards
40 CFR Part 60 Subpart GG Applicable Requirements
Standards of Performance for Stationary Gas Turbines**

40 CFR Part 60, "Standards of Performance for New Stationary Sources"

40 CFR Part 60, Subpart A, "General Provisions"

40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines"

Federally-Enforceable

Applicability:

This attachment describes the requirements of 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines", and 40 CFR Part 60 Subpart A, "General Provisions", and applies to stationary gas turbines with heat inputs equal to or greater than 10.7 gigajoules per hour (approximately 10 MMBTU/Hr) and less than 107.2 gigajoules per hour (approximately 100 MMBTU/Hr) based on the lower heating value of the fuel fired which were constructed, modified, or reconstructed after October 3, 1977. The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

Conditions:

1. Oxides of Nitrogen (NO_x expressed as NO₂) emissions from an applicable turbine shall not exceed 150 ppmvd. This limit shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and corrected to ISO standard conditions as detailed in 60.335(c)(1). The District is not providing allowances for unit efficiency or fuel bound nitrogen. (60.332(c) and 60.332(a)(2))
2. Sulfur dioxide (SO₂) emissions from an applicable turbine unit shall not exceed 0.015 percent by volume (150 ppmvd). This limit shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. (60.333(a))
3. The emission limits listed above shall not apply to the turbines when they are operated under the following conditions:
 - a. The NO_x emission limit shall not apply to applicable natural gas fired turbines when being fired with an emergency fuel. Emergency fuel is defined as a fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make

it impossible to fire natural gas in the gas turbine. (60.332(k) and 60.331(r))

- b. The NO_x and SO₂ emission limits shall not apply during periods of startup, shutdown, and malfunction. (60.8(c))
- 4. The sulfur content of the fuel burned in the applicable turbine shall not exceed 0.8 percent by weight. (60.333(b))
- 5. If the subject turbine is equipped with water injection for NO_x control, the permittee shall operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within $\pm 5.0\%$ and shall be approved by the District. (60.334(a))

For the purpose of reports required under 60.7(c), periods of excess emissions that shall be reported are defined as any one-hour period during which the average water-to-fuel ratio falls below the water-to-fuel ratio determined to demonstrate compliance with the 150 ppmvd NO_x limit by the most recent performance test. (60.334(c)(1))

The permittee shall maintain a file of all continuous emission monitoring measurements and information, and performance tests pursuant to 60.7(f).

- 6. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (60.7(b))
- 7. The permittee shall monitor and record the sulfur content of the fuel being fired in the turbine. The following test schedules and methods shall be used:
 - a. The sulfur content of liquid fuels shall be determined on each occasion that fuel is transferred to the storage tank from any other source. Test Method ASTM D 2880-71 shall be used. (60.334(b)(1) and 60.335(d))
 - b. The sulfur content of gaseous fuels shall be determined every six months, as established by the Administrator. Test Methods ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used. (60.334(b)(2) and 60.335(d))
- 8. Pursuant to 40 CFR Part 60.334(c), excess emissions and monitoring systems performance report, and/or an emissions and monitoring summary report shall be

submitted to the District on a quarterly basis. Reporting format shall follow 40 CFR Part 60 Section 60.7(c) and (d). All reports shall be postmarked by the 30th day following the end of the calendar quarter as required by 60.7(c). The frequency of the excess emission reports may be reduced by following the procedure detailed in 60.7(e). For purpose of this notice, the following information shall be included in the report:

- a. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the 150 ppmvd NO_x limit by the most recent performance test. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. (60.7(c) and 60.334(c)(1))
 - b. Exceedances of the 0.8 percent by weight sulfur content fuel limit. (60.7(c) and 60.334(c)(2))
 - c. Each period, type, reason and duration of the firing of emergency fuel. (60.7(c) and 60.334(c)(4))
9. Upon request by the District, the permittee shall perform an emissions test to determine the NO_x and SO_x emissions from the turbine. EPA Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at 30, 50, 75, and 100 percent loads or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. (60.8 and 60.335(c)(3))

8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, “New Source Review” requirements (e.g., BACT and offset requirements), or Rule 29, “Conditions on Permits” requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment PO (Title V Permit No.) PC#” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Grubb/Rincon Field**

Rule 26, “New Source Review”

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the Grubb/Rincon Field. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, “Permitted Throughput and Consumption Limit Table”, of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rules 26 and 29)
2. Combustion equipment listed in the Section No. 2 “Permitted Equipment and Applicable Requirements Table” and the Section No. 3 “Permitted Throughput and Consumption Limit Table” as being fired on natural gas shall only burn natural gas and are not permitted to burn any other fuel. (Rule 26)
3. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 448 oil wells. An Authority to Construct is required to be obtained from the District prior to drilling a new oil well. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 448 wells. (Rule 29)
4. The following wells shall be shall be free flowing, operated on gas lift, or operated

with electric motor driven artificial lift equipment:

Hobson A Lease Well No. 8-2

Padre Canyon Lease Well Nos. 71 and 108

This condition is applied as Best Available Control Technology. (Rule 26)

5. For solvent cleaning activities, including wipe cleaning, permittee shall maintain monthly records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly. Pursuant to Rule 23.F.7, solvents used for facility and building maintenance and repair are exempt from the permit. Facility maintenance and repair does not include the use of solvents for maintenance and repair of process and industrial equipment when this activity is being conducted by contractors. (Rule 29)

**Ventura County Air Pollution Control District
Additional Permit Requirements
3.3 MW Solar Centaur H Turbine**

Rule 26, “New Source Review”

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 3.3 MW Solar Centaur H Turbine located at the Grubb Lease. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Turbine emissions shall not exceed 11.50 pounds of NO_x per hour and 1.64 pounds of ROC per hour while the gas turbine generator is operating on natural gas at 100% load. This amount of emissions offsets were provided by the removal of an older gas turbine generator. Any increase in NO_x or ROC emissions over this value will be considered a modification pursuant to APCD Rule 26. Compliance with this condition shall be determined by source testing as detailed below. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0008-6.
2. This condition is applicable only if the turbine is equipped with water injection for NO_x control. The water to fuel ratio shall be maintained at 0.57 pounds of water to 1.0 pound of fuel. The water to fuel ratio shall be recorded at 15 minute intervals with a continuous monitoring system. If the water to fuel ratio is less than 0.57 and the engine operator cannot restore the proper water to fuel ratio within one hour of the system failure, the operator shall reduce the generator load to 2800 KW, or less, and notify the District Enforcement Section by calling (805) 654-2797. The turbine generator shall not be returned to full load operation until this water to fuel ratio can be restored to 0.57:1.0. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0008-6. The permittee shall maintain records of the water to fuel ratio as measured by the continuous monitoring system. Records of this information shall be made available to the District upon request.
3. The Solar Centaur H Gas Turbine shall be source tested annually. This testing

shall be performed using EPA Method 20 for NOx emissions, CARB Method 100 for CO emissions, and EPA Method 18 for ROC emissions.

The average of three source test runs shall be used to determine compliance. The tests shall be conducted at 30, 50, 75, and 100 percent loads. This test may also be used to demonstrate compliance with Attachment 74.23N2-8 of this permit.

Prior to conducting an annual emissions test, permittee shall notify the APCD Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The test report and results shall be submitted to the APCD Enforcement Section within 45 days after the test and shall demonstrate compliance with the applicable conditions of this permit. The testing may be performed while burning natural gas only if distillate fuel oil has not been burned in the gas turbine since the previous test.

4. Diesel oil may be used at the Solar Centaur H Turbine Generator for up to 50 hours annually when natural gas is not available or for the purpose of turbine testing and calibration. The 25,000 gallon annual diesel oil consumption limit in the Section No. 3 "Permitted Throughput/Consumption Limits" table of this permit is based on operation with diesel oil for 50 hours per year. This diesel oil consumption limit may be exceeded in the event that natural gas is not available due to a natural disaster, such as earthquake, fire, or flood. However, the annual BTU limit specified in Section No. 3 shall not be exceeded.

Permittee shall record the date, duration, and volume of diesel burned while operating in compliance with this requirement. Records of this information shall be made available to the District upon request.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Grubb Lease Compressor Plant Grid Power**

Rule 26, “New Source Review”

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the Grubb Lease Compressor Plant. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Southern California Edison has received Emission Reduction Credits (ERCs) for the partial electrification of the Grubb Lease Compressor Plant (Application No. 0008-331). The following compressors shall be powered by grid electricity or removed from service:

Grubb Lease Compressor Plant: CP Nos. 4, 5, 6, 7, 8, and 9

2. The permittee shall conduct an annual compliance certification to verify that the compressors are powered by grid electricity when they are in service.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Oak Grove Lease and Hobson C Lease Crude Oil Loading Facilities**

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the Oak Grove Lease and the Hobson C Lease Crude Oil Loading Facilities. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Regardless of the applicability, requirements, or exemptions of Rule 71.3, permittee shall maintain a bottom-loaded vapor recovery system at the Oak Grove and Hobson C Crude Oil Loading Facilities during all transfer operations. The vapor recovery system shall prevent all displaced vapors during loading from being released into the atmosphere. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system or to a sales gas system.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Open Top Blowdown Tanks**

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the open top blowdown tanks at the Grubb Lease. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Each open top blowdown tank shall be inspected at a minimum frequency of once per week. Any accumulated hydrocarbon liquids shall be removed upon discovery.
2. An up-to-date log shall be kept showing the actual date of each inspection, the amount of liquid removed, and the date of removal. This log shall be made available to the District upon request.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Portable 90 HP Waukesha Pump Engines**

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the 90 HP portable Waukesha pump engines at the Grubb/Rincon Field. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 90 HP portable Waukesha engine, Serial No. 250679 without catalytic converter, is permitted for emergency standby use only. As such, a standby engine shall be operated only when the 90 HP portable Waukesha engine, Serial No. 265997, with a catalytic converter, is out of service. Thus, only one (1) of the two (2) 90 HP portable Waukesha pump engines may be operated at any one time.
2. Permittee shall visually inspect the portable pump engines during each use to ensure that only one engine is operating at any one time, and that the engine is burning natural gas only. In addition, a log of engine operating hours shall be kept and shall be made available to the District upon request.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Portable Open Top Mixing Tanks**

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the portable open top mixing tanks at the Grubb/Rincon Field. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The open top portable tanks are to be used only during facility maintenance for the temporary storage of solid materials from tank bottoms. The open top portable tanks shall not be used for the storage of petroleum and/or reactive organic compound fluids or to increase the storage capacity of any tank battery.
2. When in use and not actively being filled with tank bottom solids, the open top portable tanks shall be covered with plastic or other such material to minimize emissions to the atmosphere.
3. Permittee shall visually inspect the open top portable tanks during each use to ensure that they are used properly in accordance with the requirements above.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Grubb Lease Tank Battery No. 1
C.E. Natco Heater Treater**

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the C.E. Natco Heater Treater located at the Grubb Lease Tank Battery No. 1. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The C.E. Natco Heater Treater has been derated from 9.0 MMBTU/Hr to 4.5 MMBTU/Hr by disconnecting the gas supply to the second 4.5 MMBTU/Hr burner, rendering it inoperable. The Heater Treater shall be operated only on the burner side listed as S/N 16388.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Out of Service Turbines**

Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the two (2) 1200 BHP Solar Turbine Generators located at the Grubb/Rincon Field that are currently designated as “Out of Service”. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The two (2) 1200 BHP Solar Turbine Generators that are currently designated as “Out of Service” are shutdown and shall not be operated. These units have not demonstrated compliance with Rule 74.23.

9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No.) ____” in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"

Federally-Enforceable Version Adopted 5/23/72

Federally-Enforceable OCS Version Adopted 2/20/79

District-Enforceable Version Adopted 2/20/79

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50, permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey

identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

Ventura County Air Pollution Control District
Rule 52 Applicable Requirements
Particulate Matter - Concentration (Grain Loading)

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
Adopted 5/23/72, Federally-Enforceable

Applicability:

This attachment applies to all external combustion emissions units and internal combustion engines at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to steam generators or gas turbines while combusting liquid or gaseous fuels.

Conditions:

1. Pursuant to Rule 52, permittee shall not discharge into the atmosphere from any source particulate matter in excess of the concentration listed in the table shown in Rule 52. For the purpose of Rule 52, particulate matter includes any material which would become particulate matter if cooled to standard conditions.
2. Periodic monitoring is not necessary to certify compliance with Rule 52. To certify compliance, a reference to the District analysis of Rule 52 compliance based on EPA emission factors is sufficient.

Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds"

Federally-Enforceable Version Adopted 7/5/83

District-Enforceable Version Adopted 6/14/94

Rule 64, "Sulfur Content of Fuels"

Federally-Enforceable Version Adopted 7/5/83

Federally-Enforceable OCS Version Adopted 6/14/94

District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO₂) by volume at the point of discharge.
2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.
3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

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Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"
Federally-Enforceable Version Adopted 7/5/83
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
2. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
3. Upon District request, ground or sea level concentrations of SO₂ shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:
 - a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.

- b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.
- c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

Ventura County Air Pollution Control District
Rule 57.B Applicable Requirements
Combustion Contaminants - Specific - Fuel Burning Equipment

Rule 57.B, "Combustion Contaminants - Specific", Fuel Burning Equipment
Federally-Enforceable Version Adopted 8/17/76
Federally-Enforceable OCS Version Adopted 6/14/77
District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below for the 6/14/77 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all external combustion emission units, internal combustion engines, and gas turbines at this stationary source that burn either natural gas or fuel oil.

Conditions:

1. Pursuant to Rule 57.B, permittee shall not discharge into the atmosphere from any fuel burning equipment combustion contaminants exceeding in concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions.

Combustion contaminants are defined as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.

2. Periodic monitoring is not necessary to certify compliance with Rule 57.B. To certify compliance, a reference to the District analysis based on EPA emission factors and a representative source test is sufficient.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"

Federally-Enforceable Version Adopted 7/5/83

Federally-Enforceable OCS Version Adopted 6/14/94

District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuel.

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), except for natural gas which is limited to 15 grains per 100 cubic feet (236 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64. Natural gas is a gaseous fuel purchased or transported under a Federal Energy Regulatory Commission or a California Public Utility Commission (PUC) jurisdictional tariff.
2. If only PUC-quality natural gas is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements.
3. If other than PUC-quality natural gas is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix. This annual fuel analysis shall be maintained at the facility and shall be provided to the District with the annual compliance certification.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Solid or Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"

Federally-Enforceable Version Adopted 7/5/83

Federally-Enforceable OCS Version Adopted 6/14/94

District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting solid or liquid fuel. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any solid or liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.
2. For each solid or liquid fuel delivery, permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-83 or D2622-87, to ensure that compliance with Rule 64 is being maintained. The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

**Ventura County Air Pollution Control District
Rule 68 Applicable Requirements
Carbon Monoxide**

Rule 68, "Carbon Monoxide"

Federally-Enforceable Version Adopted 5/23/72

Federally-Enforceable OCS Version Adopted 6/14/77

District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all external combustion emission units at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to internal combustion engines.

Conditions:

1. Pursuant to Rule 68, permittee shall not discharge into the atmosphere carbon monoxide (CO) in concentrations exceeding 2,000 ppm by volume measured on a dry basis at standard conditions.
2. Periodic monitoring is not necessary to certify compliance with Rule 68. To certify compliance, a reference to the District analysis of Rule 68 compliance based on EPA emission factors is sufficient.

Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"

Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:
 - a. A fuel or sales gas system
 - b. A flare that combusts reactive organic compounds
2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.
3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.
4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these

inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 6/8/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.
2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

Ventura County Air Pollution Control District
Rule 71.4.B.3 Applicable Requirements
Well Cellar Storage Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"
Adopted 6/8/93, Federally Enforceable

Applicability:

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

Conditions:

1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.
2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.
3. Permittee shall perform routine surveillance and visual inspections of well cellars to ensure that compliance with Rule 71.4.B.3 is being maintained.
4. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"

Federally-Enforceable Version Adopted 12/10/91

Federally-Enforceable OCS Version Adopted 5/8/90

District-Enforceable Version Adopted 7/9/96

Compliance with the conditions listed below for the 7/9/96 version of the rule will ensure compliance with all three versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source. This attachment does not apply to cleanup and substrate surface preparation regulated by other APCD surface coating and solvent rules. Solvent cleaning is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, such solvents are required to comply with Rule 74.6.

Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rule 74.6.1, "Cold Cleaners", APCD Rule 74.6.2, "Batch Loaded Vapor Degreasers", or APCD Rule 74.6.3, "Conveyorized Degreasers", are exempt from the solvent requirements and cleaning devices and methods requirements of Rule 74.6.B.1 and 74.6.B.2.

Conditions:

1. Pursuant to Rule 74.6.B.1, effective July 9, 1997, solvent cleaning activities shall meet the following requirements:
 - a. Solvents used for repair and maintenance cleaning shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 20 mmHg at 20°C, as applied.

- b. Solvents used for cleanup, including cleaning of application equipment, shall not exceed an ROC content of 950 grams per liter and an ROC composite partial pressure of 35 mmHg at 20°C, as applied.
 - c. Solvents used for manufacturing or surface preparation shall not exceed an ROC content of 70 grams per liter.
- 2. Pursuant to Rule 74.6.B.2, effective July 9, 1997, no person shall perform solvent cleaning unless one of the following cleaning devices or methods is used:
 - a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
 - b. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
 - c. Non-atomized solvent flow, dip, or flush method where pooling is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;
 - d. A properly used enclosed gun washer or low emission spray gun cleaner.
- 3. Pursuant to Rule 74.6.B.3.a, no person shall atomize solvent into open air.
- 4. Pursuant to Rule 74.6.B.3.b, no person shall allow liquid cleaning solvent to leak from any equipment or container.
- 5. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying.
- 6. Pursuant to Rule 74.6.B.4.b, all waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
- 7. Pursuant to Rule 74.6.C.1, Rule 74.6 shall not apply to:
 - a. Cleaning activities using cleaning agents that contain two percent or less organic solvent, as applied by weight.

- b. Cleaning activities using solvents which are purchased in, and applied from, manufacturer- or distributor-labeled containers of one liter or less in volume, including aerosol products.
 - c. Janitorial cleaning including graffiti removal.
 - d. Cleaning activities conducted at residences, schools, medical care facilities, prisons, restaurants, health clubs and theaters.
 - e. Stripping of cured coatings (e.g.; stripping), cured adhesives (e.g.; debonding, ungluing), and cured inks.
 - f. Cleaning activities subject to any provision, including recordkeeping and exemption provisions, of the APCD Rules listed in Rule 74.6.C.1.f.
8. Pursuant to Rule 74.6.C.2, Rule 74.6 shall not apply to:
- a. Any cleaning device or mechanism and associated operating conditions which has been approved in writing by the Air Pollution Control Officer (and which may be operated pending approval by the Environmental Protection Agency and the California Air Resources Board) to result in emissions lower than the emissions that would result if the cleaning were performed in compliance with the requirements of those rules.
 - b. Any cleaning device or mechanism for which emissions are regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).
9. Pursuant to Rule 74.6.C.3, Rule 74.6.B.1 shall not apply to:
- a. Cleaning of electronic components or medical devices using solvent with an ROC composite partial pressure of 33 mm Hg at 20°C or less and an ROC content of 900 g/l or less. The use of isopropyl alcohol shall be deemed in compliance with this requirement.
 - b. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
 - c. Cleaning in laboratory tests and analyses, or bench scale or short term research and development programs.

- d. Removal of elemental sodium from the inside of pipes and lines.
 - e. Cleaning of mold release compounds from molds.
 - f. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
 - g. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.
 - h. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on a weekly basis.
10. Pursuant to Rule 74.6.C.4, Rule 74.6.B.1 and Rule 74.6.B.2 shall not apply to:
- a. Aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l as applied or less.
 - b. Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rules 74.6.1, 74.6.2, or 74.6.3, as applicable.
11. Pursuant to Rule 74.6.D, permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
- a. Solvent name and manufacturer's description.
 - b. All intended uses of the solvent at the facility, classified as follows:
 - 1. Repair or maintenance cleaning, or
 - 2. Cleanup, including application equipment cleaning, or
 - 3. Manufacturing or surface preparation cleaning, or
 - 4. Solvent used pursuant to an exemption in Rule 74.6.C (specify the exemption claimed).

- c. The ROC content (and ROC composite partial pressure, if applicable) of the solvent.
- d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be submitted to the District upon request.

12. Permittee shall perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

- a. Pursuant to Rule 74.6.E.1, the ROC content of materials shall be determined by EPA Test Method 24 or 24A.
- b. Pursuant to Rule 74.6.E.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.
- c. Pursuant to Rule 74.6.E.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
- d. Pursuant to Rule 74.6.E.6, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.E.5.
- e. Pursuant to Rule 74.6.E.7, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a

minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to the crude oil and natural gas production and processing facilities, and to natural gas processing plants, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10, except for those requirements specified under Rule 74.10.B.3. Rule 74.10.B.3 requirements, which are covered in a separate attachment, only apply to natural gas processing plants, except for those plants that are less than 10 million standard cubic feet per day capacity and do not fractionate natural gas liquids.

A crude oil production and processing facility is any facility where crude oil production and processing are conducted as defined in the Standard Industrial Classification Code 1311. A natural gas processing plant is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products such as ethane, propane, butane, and natural gasoline. Excluded from the definition of natural gas processing plant are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B.1, hatches shall be closed at all times except during sampling or attended maintenance operations.
2. Pursuant to Rule 74.10.B.2, no person shall use a component at a crude oil or natural gas production facility, or a natural gas processing plant, if such component leaks (as defined in Rule 74.10.J.9) reactive organic compounds when the applicable maximum leak threshold for that component category as listed in Attachment 1 of Rule 74.10 has been exceeded at the facility after the applicable effective date in any calendar quarter. Rule 74.10.B.2 shall not apply to components that are tagged and repaired in accordance with Rule 74.10.C and 74.10.E.

3. Pursuant to Rule 74.10.C.1, permittee shall visually inspect pumps, including but not limited to rod pumps and compressor pumps, not less than weekly for liquid leaks.
4. Pursuant to Rule 74.10.C.2, permittee shall monitor the following components at least every quarter for gaseous leaks in accordance with EPA Reference Method 21. All other components not listed below, except flanges designated in the Operator Management Plan as exempt from inspection requirements, shall be monitored at least annually in accordance with EPA Reference Method 21:
 - a. Valves
 - b. Packing seals on dump lever arms connected to gas traps, separators, or vessels
 - c. Hatches on non vapor recovery tanks
 - d. Polished rod stuffing boxes
 - e. At natural gas processing plants: compressor seals, pressure relief devices, and pumps

As detailed in Rule 74.10.C.4, permittee may qualify for annual, rather than quarterly, monitoring of specified components by achieving a good performance level for five consecutive quarters and submitting a written request to the District Enforcement Section. A reduction in monitoring frequency will not become effective until written approval by the District is received by the permittee. Pursuant to Rule 74.10.C.5, quarterly monitoring shall be reinstated by the permittee during the next calendar quarter upon failure to achieve a good performance level.

5. In addition to the weekly and quarterly monitoring required above, permittee shall perform routine surveillance of the applicable components to ensure that compliance with Rule 74.10 is being maintained. This routine surveillance shall include verifying that proper operation and equipment and inspection requirements are being met.
6. Pursuant to Rule 74.10.C.3, upon detection, permittee shall affix a readily visible tag to all leaking components with the date that leaks are detected. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.
7. Pursuant to Rule 74.10.D, permittee shall submit an Operator Management Plan to the District Enforcement Section for approval. No provision in the Operator Management Plan, approved or not, shall conflict with or take precedence over

any provision of Rule 74.10. The Operator Management Plan shall identify any component exempt from Rule 74.10 (as detailed in Rule 74.10.F) or part of Rule 74.10, and describe the procedures that the permittee intends to use to comply with the requirements of Rule 74.10. The Operator Management Plan must identify all components detailed in Rule 74.10.D.1.

Permittee shall submit a new or modified Operator Management Plan to the District Enforcement Section for approval for a modification to this facility covered under an existing plan.

Permittee shall be required, upon written request by the District, to re-qualify, by analysis, any exemption(s) from Rule 74.10 or part of Rule 74.10 if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Operator Management Plan shall be submitted to the District Enforcement Section within 90 days after receipt of the District request.

If the exempt status of a component is affected by a revision to this rule, then the Operator Management Plan shall be modified accordingly. The modification to the Operator Management Plan shall be submitted to the District Enforcement Section no later than 90 days after adoption of the rule revision.

8. Pursuant to Rule 74.10.E, any component found leaking shall be repaired to a leak free condition as soon as practicable but no later than 21 days from the detection date. Any component found leaking at a natural gas processing facility shall be repaired to a leak free condition no later than 15 days from the detection date.

A leaking component which is an essential part of a critical process unit identified in an approved Operator Management Plan must be repaired during the next scheduled shutdown or process turnaround of the unit, but not later than three (3) months from the date of detection.

Permittee shall re-inspect components for leaks as soon as practicable, but not later than one week after the date on which the component is repaired.

Any component leak identified by the District shall be repaired and inspected according to the timeframes required above by this condition.

9. Pursuant to Rule 74.10.H, the following test methods shall be used to demonstrate compliance with Rule 74.10 or to qualify for an exemption from Rule 74.10:

- a. Pursuant to Rule 74.10.H.1, gaseous leaks from components shall be determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.
 - b. Pursuant to Rule 74.10.H.2, the ROC concentration, by weight, of gaseous process streams shall be measured by ASTM E168-67 (General Techniques of Infrared Qualitative Analysis), ASTM E169-63 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-73 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.
 - c. Pursuant to Rule 74.10.H.3, the ROC concentration, by weight, of liquid process streams not at natural gas processing plants, shall be measured using ASTM Method D96 (Water Cut and Sediment). The ROC concentration of the liquid shall be the material remaining after separating the water and sediment.
 - d. Pursuant to Rule 74.10.H.4, the API gravity of crude oil shall be determined using ASTM Method D287.
10. Pursuant to Rule 74.10.G, permittee shall maintain an inspection log containing, at a minimum, the following:
- a. The location, type, description of each leaking component inspected, and name of any operating unit where each leaking component is found
 - b. Date of leak detection and method of detection
 - c. Date that leak is repaired to a leak free condition, and date of re-check
 - d. Identification of leaks from critical process units
 - e. Number of components inspected, number and percentage of leaking components found, categorized by the following groups:
 - 1. Hatches
 - 2. Polished rod stuffing boxes
 - 3. Dump lever arms
 - 4. Valves (not open ended)
 - 5. Open ended lines
 - 6. Flanges (if designated in Operator Management Plan as exempt from inspection requirements)
 - 7. Other components

This information shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/9/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
 - I. with NO_x (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
 - II. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

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10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No.) ____” or “Attachment 40CFR61.M” in the lower left corner of each attachment.

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Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"

Federally-Enforceable OCS Version Adopted 11/12/91

District-Enforceable Version Adopted 11/12/91

The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
 - a. Steel or iron shot/grit is used exclusively
 - b. The item to be blasted exceeds eight feet in any dimension
 - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
 - a. Wet abrasive blasting
 - b. Hydroblasting

- c. Vacuum blasting
 - d. Dry blasting with California ARB certified abrasives
- 3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.
- 4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
- 5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
- 6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
- 7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

- a. Date of operation
- b. Type of abrasive blasting media used
- c. Identity, size, and location of item blasted
- d. Whether operation was conducted inside or outside a permanent building
- e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"

Federally-Enforceable Version Adopted 11/22/83

Federally-Enforceable OCS Version Adopted 8/11/92

District-Enforceable Version Adopted 8/11/92

The District-enforceable version of this rule has been determined by EPA to be more stringent than the current SIP version of the rule and therefore compliance with the conditions listed below for the 8/11/92 version of the rule will ensure compliance with the current federally-enforceable requirements for all subject sources. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. Architectural coatings are coatings applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of general architectural coatings, except specialty coatings shall not exceed 250 grams per liter of coating excluding water, exempt organic compounds and any colorant added to tint bases, unless specifically exempted by Rule 74.2.
2. Pursuant to Rule 74.2.B.3, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.
3. Pursuant to Rule 74.2.B.6, the VOC content of lacquers shall not exceed 680 grams per liter of coating as applied, excluding water; the VOC content of industrial maintenance primers and topcoats shall not exceed 420 grams per liter of coating as applied, excluding water; and the VOC content of quick-dry enamels shall not exceed 400 grams per liter of coating as applied, excluding water.

4. Pursuant to Rule 74.2.B.7, all VOC-containing materials shall be stored in closed containers when not in use.
5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
6. Pursuant to Rule 74.2.E, the VOC content of architectural coatings shall be measured using EPA Method 24, the VOC content from exempt organic compounds shall be measured using CARB Method 432, the acid content of pre-treatment wash primers shall be measured using ASTM Method D 1613-85 (modified), and the metal content of metallic pigmented coatings shall be measured using SCAQMD Method 311-91.

Ventura County Air Pollution Control District
Rule 74.4.D Applicable Requirements
Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt"
Adopted 7/5/83, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

Conditions:

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.
2. Permittee shall sample and test oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

Ventura County Air Pollution Control District
Rule 74.16 Applicable Requirements
Oilfield Drilling Operations

Rule 74.16, "Oilfield Drilling Operations"
Federally-Enforceable OCS Version Adopted 1/8/91
District-Enforceable Version Adopted 1/8/91

The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving all oilfield drilling operations. Oilfield drilling operations are defined as activities powered by nonvehicular internal combustion engines for the purpose of drilling or redrilling oil wells, injection wells, or gas wells. For the purpose of Rule 74.16, drilling operations do not include any operations at any existing well where the derrick is a part of an oilwell production service unit, as defined in the California Vehicle Code. Rule 74.16 applies to drill rig engines over 50 HP including, but not limited to, engines supplying power to drawworks, rotary tables, mud pumps, mud mixers and auxiliary generators.

This attachment applies to an oil company, which Rule 74.16 defines as the person contracting the drilling rig and/or the person who applies for an Authority to Construct for the well. The APCD issues portable Permits to Operate to the owners of drilling rigs.

This permit does not authorize the operation of any non-vehicular engine of 50 BHP, or greater, for well drilling or workover operations. Prior to using such an engine, the engine owner shall obtain a Permit to Operate for the engine.

Conditions:

1. Pursuant to Rule 74.16.B.1, all drilling operations shall be powered by grid power, unless exempted by Rule 74.16.C.1. Grid power is defined as electricity conveyed by power lines connected physically and contractually to the Southern California Edison System, or any electricity generated by equipment permitted by the District and having permitted emissions commensurate with an emissions rate of not more than 1.0 pound of NO_x per megawatt-hour of electricity produced.
2. Pursuant to Rule 74.16.C.1, an oil company may petition the Air Pollution Control Officer for exemption from Rule 74.16.B.1 by submitting a cost evaluation for grid

powered drilling. Best Available Control Technology cost guidelines shall be used to determine cost effectiveness. As detailed in APCD Rule 44, "Exemption Evaluation Fee", Rule 44.B.2 requires that any person requesting an exemption from Rule 74.16 that is based on a cost evaluation shall be assessed an evaluation fee of \$450.00.

3. Pursuant to Rule 74.16.B.2.a, if a drilling operation is exempt from Rule 74.16.B.1, NO_x emissions from drilling engines, or any exhaust stack of multiple engines permanently manifolded together, shall not exceed 515 ppmv corrected to 15% oxygen. As an alternate, pursuant to Rule 74.16.B.2.c, drilling engines certified by the manufacturer to emit 6.9 grams of NO_x per brake horsepower-hour or less based on a California ARB approved heavy duty offroad engine testing procedure shall be deemed in compliance with Rule 74.16.B.2.a, and shall not be subject to the annual source test requirements in Rule 74.16.B.2.b.

In order to comply with this condition, permittee shall ensure that the drilling rig utilized has a valid APCD Permit to Operate and that the drilling rig has demonstrated compliance with Rule 74.16.B.2.a in accordance with CARB Method 100 as detailed in Rule 74.16.E (Test Methods), or has demonstrated compliance with Rule 74.16.B.2.c.

4. In order to demonstrate compliance with Rule 74.16.B.2.a, the drilling rig company shall perform source testing on the drilling engine exhaust annually. Permittee shall obtain from the drilling rig company the most recent source test results for the exempt engines subject to Rule 74.16.B.2.a, or the engine manufacturer certification for exempt engines subject to Rule 74.16.B.2.c. This information shall be made available on site and submitted to the District upon request.
5. Upon District request, the NO_x emissions from the drilling engine exhaust shall be measured using CARB Method 100, in accordance with Rule 74.16.E (Test Methods).
6. In order to demonstrate compliance with Rule 74.16.C.1, permittee shall maintain documentation on the cost analysis as verification to the grid power exemption. This documentation shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.26 Applicable Requirements
Crude Oil Storage Tank Degassing Operations

Rule 74.26, "Crude Oil Storage Tank Degassing Operations"
Adopted 11/8/94, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving degassing of any aboveground crude oil or produced water storage tank that is equipped with a vapor recovery system and has a storage capacity greater than 2,000 barrels; or has a storage capacity of 2,000 barrels and stores a liquid having a modified Reid vapor pressure (mRVP) of 3.4 pounds per square inch (psi) absolute or greater. This attachment also applies to any external or internal floating roof crude oil tank that has a vapor space of 2,000 barrels or more when the tank's roof is resting on the tank's inner roof supports. Rule 74.26 does not apply to vessels rated and operated to contain normal working pressure of at least 15 psi gauge without vapor loss to the atmosphere.

Degassing is defined as the removal of organic vapors from a stationary storage tank for the purpose of cleaning, removing the tank, cleaning the tank's interior, or making repairs to the tank that would require the complete removal of product from the tank.

This permit does not authorize the operation of any air pollution control device for tank degassing operations. This includes, but is not limited to, a thermal or catalytic incinerator, a carbon adsorber, a condenser, or an internal combustion engine. Prior to using such a device, the owner of the air pollution control device shall obtain a Permit to Operate for the device.

Conditions:

1. Pursuant to Rule 74.26.B.1, no person shall conduct or allow the degassing of any storage tank subject to Rule 74.26, unless the emissions are controlled by one of the following options:
 - a. Liquid displacement into a vapor recovery system, flare, or fuel gas system (Rule 74.26.B.1.a). Liquid displacement is defined as the removal of ROC vapors from within a storage tank drained of liquid product by introducing into the tank a liquid having an ROC modified Reid vapor pressure (mRVP) of less than 0.5 psi absolute until at least 90 percent of the tank's vapor volume has been displaced, with the mRVP determined using ASTM

Method D 323-82 conducted at 68 degrees Fahrenheit (Rule 74.26.F.10).
or

- b. An air pollution control device that has a vapor destruction and removal efficiency of at least 95 percent until the vapor concentration in (Rule 74.26.B.1.b):
 - 1. Aboveground crude oil or produced water tanks equipped with a vapor recovery system, is less than 10 percent of the tank's initial vapor concentration determined immediately prior to the tank degassing, or less than 10,000 ppmv, measured as methane, or
 - 2. Floating roof tanks, is less than 10,000 ppmv, measured as methane.

Fugitive emissions that do not qualify as a leak shall be allowed around tank openings such as a manhole during a tank degassing operation performed in compliance with Rule 74.26.

Pursuant to Rule 74.26.E.3, compliance with the above limits shall require that the tank vapor concentration remain at or below 10,000 ppmv for at least one hour as demonstrated by measuring the vapor concentration at least four times at 15-minute intervals. The monitoring instrument used to measure the vapor concentration shall meet the specifications of EPA Method 21.

- 2. Pursuant to Rule 74.26.B.2, any receiving vessel used during a tank cleaning operation shall either be bottom loaded or shall be loaded by submerged fill pipe. Any vapors emitted from such vessels during a tank degassing operation shall be controlled with an air pollution control device as required by Rule 74.26.B.1.b. As defined in Rule 74.26.F.14, a receiving vessel is a vessel used to receive liquids or sludge material removed from an ROC liquid storage tank during a tank degassing operation.
- 3. Pursuant to Rule 74.26.B.3, except during an emergency, the District Enforcement Section shall be notified verbally or in writing at least 48 hours prior to starting any tank degassing operation. Such notification shall include an identification of the tank(s) to be degassed and the air pollution control method employed. If a tank degassing operation was required due to an emergency, the District Enforcement Section shall be notified as soon as reasonably possible but no later than four hours after completion of the operation. An emergency is defined as an unplanned and

unexpected event that, if not immediately attended to, presents a safety or public health hazard or an unreasonable financial burden.

4. In order to demonstrate compliance for air pollution control devices used to comply with Rule 74.26.B, operator shall record:
 - a. The vapor concentration in parts per million (ppm) and gas flow rate in cubic feet per minute (cfm) entering and exiting the device (except for a flare) upon beginning use of the device and every thirty minutes thereafter. The instrument used to measure vapor concentration shall meet the specifications of EPA Method 21, and
 - b. The tank's vapor concentrations determined in accordance with Rule 74.26.E.3, and
 - c. If a refrigerated condenser is used, permittee shall record the condenser temperature in degrees Fahrenheit upon beginning use of the condenser and every thirty minutes thereafter. These records shall be maintained and shall be submitted to the District upon request.

In addition, permittee shall perform routine surveillance of the tank degassing operation to ensure that the equipment is properly operating.

5. Pursuant to Rule 74.26.D.3, any person claiming an exemption for a storage tank based on mRVP shall provide records that demonstrate that the liquid stored in the tank has a mRVP less than 3.4 psi absolute, as determined by ASTM Method D 323-82.
6. Pursuant to Rule 74.26.E.2, methods for determining vapor destruction or removal efficiency include vapor flow through the pipes, measured using EPA Method 2A; and the vapor concentration entering and exiting the device, measured using EPA Method 25A. This testing shall be performed upon District request.
7. Pursuant to Rule 74.26.E.3, the monitoring instrument used to measure the tank vapor concentration specified in Subsection B.1.b shall meet the specifications of EPA Method 21 and shall contain a probe inlet located one foot above the bottom of the tank or one foot above the surface of any sludge material on the bottom of the tank. For upright, cylindrical aboveground tanks, the probe inlet shall be (1) located at least 2 feet away from the inner surface of the tank wall and (2) if samples are withdrawn from a manhole, inserted in an opening of no more than one inch diameter on a flexible or inflexible material that is impermeable to reactive organic compound (ROC) vapors, secured over the manhole.

8. In order to comply with the above conditions, permittee shall insure that any tank degassing subcontractor utilized has a valid APCD Permit to Operate for portable tank degassing emission control equipment and that the control equipment complies with Rule 74.26, in accordance with Rule 74.26.E (Test Methods) when necessary.
9. Pursuant to Rule 74.26.C.2, the provisions of Section B of Rule 74.26 shall not apply to in-service tanks undergoing maintenance, including but not limited to repair of regulators, fittings, deck components, hatches, valves, flame arrestors, or compressors, or any leaks found pursuant to the operator inspection requirements in Rule 74.10, provided that (1) the operation will take no longer than 24 hours to complete and (2) the maintenance operation does not require the complete draining of product from the tank.

Ventura County Air Pollution Control District
Rule 74.29 Applicable Requirements
Soil Decontamination Operations

Rule 74.29, "Soil Decontamination Operations"
Adopted 10/10/95, District-Enforceable

This rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving soils that contain gasoline, diesel fuel, or jet fuel. Rule 74.29 does not apply to soil that contains only crude oil or was contaminated by a leaking storage tank used in an agricultural operation engaged in the growing of crops or the raising of fowl or animals.

Specifically, this attachment applies to the aeration of soil that contains gasoline, diesel fuel, or jet fuel. Aeration is defined as the exposure of excavated soil, containing diesel fuel, gasoline, or jet fuel, to the atmosphere without the use of air pollution control equipment or vapor extraction equipment.

Remediation equipment for contaminated soil requires an APCD permit. Rule 74.29 requirements for such remediation equipment would be addressed in another permit attachment, if applicable. As detailed in APCD Rule 23.F.23, any soil aeration project exempt from the soil aeration limit in Rule 74.29 pursuant to Subsection C.1, C.2, or C.3 of Rule 74.29 is exempt from the requirement to obtain a permit for the soil aeration project. Also, pursuant to APCD Rule 23.F.24, any soil remediation project where collected vapors are not emitted to the atmosphere by any means is exempt from the requirement to obtain a permit.

Conditions:

1. Pursuant to Rule 74.29.B.1.a, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration emits organic vapors sufficient to cause a calibrated organic vapor analyzer meeting the specifications of EPA Method 21 to register 50 parts per million by volume (ppmv) above background, as hexane, or more, except nonrepeatable momentary readings, as determined by the method specified in Rule 74.29.F.5.
2. Pursuant to Rule 74.29.B.1.b, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration causes a nuisance, as

defined in the California Health and Safety Code Section 41700 and APCD Rule 51, "Nuisance".

3. Pursuant to Rule 74.29.B.3, no person shall operate an in-situ soil bioventing or bioremediation system that emits fugitive gasses to the atmosphere if such gasses contain organic compounds sufficient to cause a calibrated organic vapor analyzer meeting the specifications of EPA Method 21 to register 50 ppmv above background, as hexane, or more, except nonrepeatable momentary readings, when measured at a distance of three inches from the soil surface.

For each soil decontamination operation where in-situ soil bioventing or bioremediation occurs, permittee shall determine compliance with Rule 74.29.B.3 on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

4. Pursuant to Rule 74.29.B.4, the owner or operator of any underground gasoline storage tank shall notify the District Enforcement Section at least 24 hours prior to the beginning the excavation of the said storage tank.
5. Pursuant to Rule 74.29.C.2, Rule 74.29.B.1.a shall not apply to any soil aeration project where the owner or operator demonstrates to the satisfaction of the District that the following two requirements are met:
 - a. The project is not located within 1,000 feet of the outer boundary of a school, and
 - b. The project will result in the emissions of less than 200 pounds of reactive organic compounds (ROC) per rolling twelve month period as determined in accordance with Rule 74.29.F.1 and 74.29.F.2.

As detailed in APCD Rule 44, "Exemption Evaluation Fee", Rule 44.B.4 requires that any person requesting an exemption from the soil aeration requirements pursuant to Rule 74.29.C.2, that is based on the amount of ROC emissions, shall be assessed an evaluation fee of \$250.00. The exemption request shall be submitted to the District Engineering Section.

6. Pursuant to Rule 74.29.C.3, the soil aeration requirements of Rule 74.29.B.1.a shall not apply to:
 - a. Soil excavation activities necessary for the removal of in-situ soil such as in the removal of an underground storage tank, pipe or piping system,

provided the exposed soil is properly covered within one hour of terminating the activity; or

- b. Soil moving, loading, or transport activities performed for the sole purpose of complying with local, state, or federal laws, provided the soil is properly handled in accordance with such laws; or
 - c. Soil excavation or handling occurring as a result of an emergency as declared by an authorized health officer, agricultural commissioner, fire protection officer, or other authorized agency officer. Whenever possible, the District Enforcement Section shall be notified prior to commencing such excavation; or
 - d. Any soil aeration project involving less than 10 cubic yards of contaminated soil, provided the soil contains less than 0.8 percent by weight contaminant, as analyzed in accordance with Rule 74.29.F.2; or
 - e. Soil contamination which resulted from a spill or release of less than one barrel of diesel fuel, jet fuel, or gasoline; or
 - f. Contaminated soil used as an alternative daily cover, as defined by Rule 74.29.G.2, at permitted Class III Solid Waste Disposal Sites.
7. Pursuant to Rule 74.29.F.5, in order to determine compliance with the aeration limit of Rule 74.29.B.1.a, a portion of soil measuring three inches in depth and no less than six inches in diameter shall be removed from the soil surface and the probe inlet shall be placed near the center of the resulting hole, level with the soil surface surrounding the hole.

For each soil decontamination operation where soil aeration occurs, permittee shall determine compliance with Rule 74.29.B.1.a on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

8. Pursuant to Rule 74.29.F.1 and 74.29.F.2, in order to determine compliance with the ROC emission limit of Rule 74.29.C.2.b, the aeration project emissions shall be determined by the calculation in Rule 74.29.F.1, and the weight percent of contaminant in soil samples shall be determined by EPA Method 8015B per Rule 74.29.F.2.

For each soil decontamination operation where soil aeration occurs, permittee shall determine compliance with Rule 74.29.C.2.b as detailed above. A dated record of

these calculations and measurements shall be maintained at the facility and submitted to the District upon request.

9. Pursuant to Rule 74.29.D, permittee shall record each date soil was aerated and the quantity of soil aerated on each date for any soil aeration project subject to Rule 74.29. These records shall be maintained at the facility and submitted to the District upon request.
10. Permittee shall perform routine surveillance of the soil aeration operation or the underground gasoline storage tank excavation operation to ensure that compliance with Rule 74.29.B.1, 74.29.B.3, and Rule 74.29.B.4 is being maintained. This routine surveillance shall include assuring that proper operation requirements are being met.

11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

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Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.A.6)
2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.A.7)
5. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part

70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.A.10)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
 - a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
 - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.1)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.A.8)
9. A Part 70 permit shall be reopened under the following conditions:
 - a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

- b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;
- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.A.11)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.A.9)
- 12. If any term or condition of this Part 70 permit shall for any reason be adjudged by a court of competent jurisdiction to be unconstitutional or invalid, such judgment shall not effect or invalidate the remainder of this Part 70 permit, but shall be confined in its operation to the term or condition directly involved in the controversy in which such judgment shall have been rendered. It is hereby declared to be the intent of the District, that this Part 70 permit would have been issued and enforced in any case had such invalid term or condition not been included. (40 CFR 70.6(a)(5), APCD Rule 33.3.A.5)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- 14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70

permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.6(c)(5), APCD Rule 33.9.D)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the date of the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.6(c)(5), APCD Rule 33.3.B.3, APCD Rule 33.9.C)

Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 10 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label “Attachment 40CFR(Part No.) __” in the lower left corner of each attachment.

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**Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans**

**40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable**

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.140. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

**Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone**

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners. An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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13. TITLE V PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit. During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is also contained in this section of the permit.

The permit application is presented as submitted by the facility. Additional information received after the application was deemed complete is contained as a separate section at the end of the application. This additional information is accompanied by a TVAF-60 "Modification to Part 70 Permit Application" form and has also been copied and placed in its designated section in the original permit application package. Pages copied on "green" paper are new or modified submittals. If a new page has replaced an existing page, the existing page has been stamped "REPLACED". Any page that has been identified for removal, has been removed from the original application and has been placed in a "REMOVED" section near the end of the application.